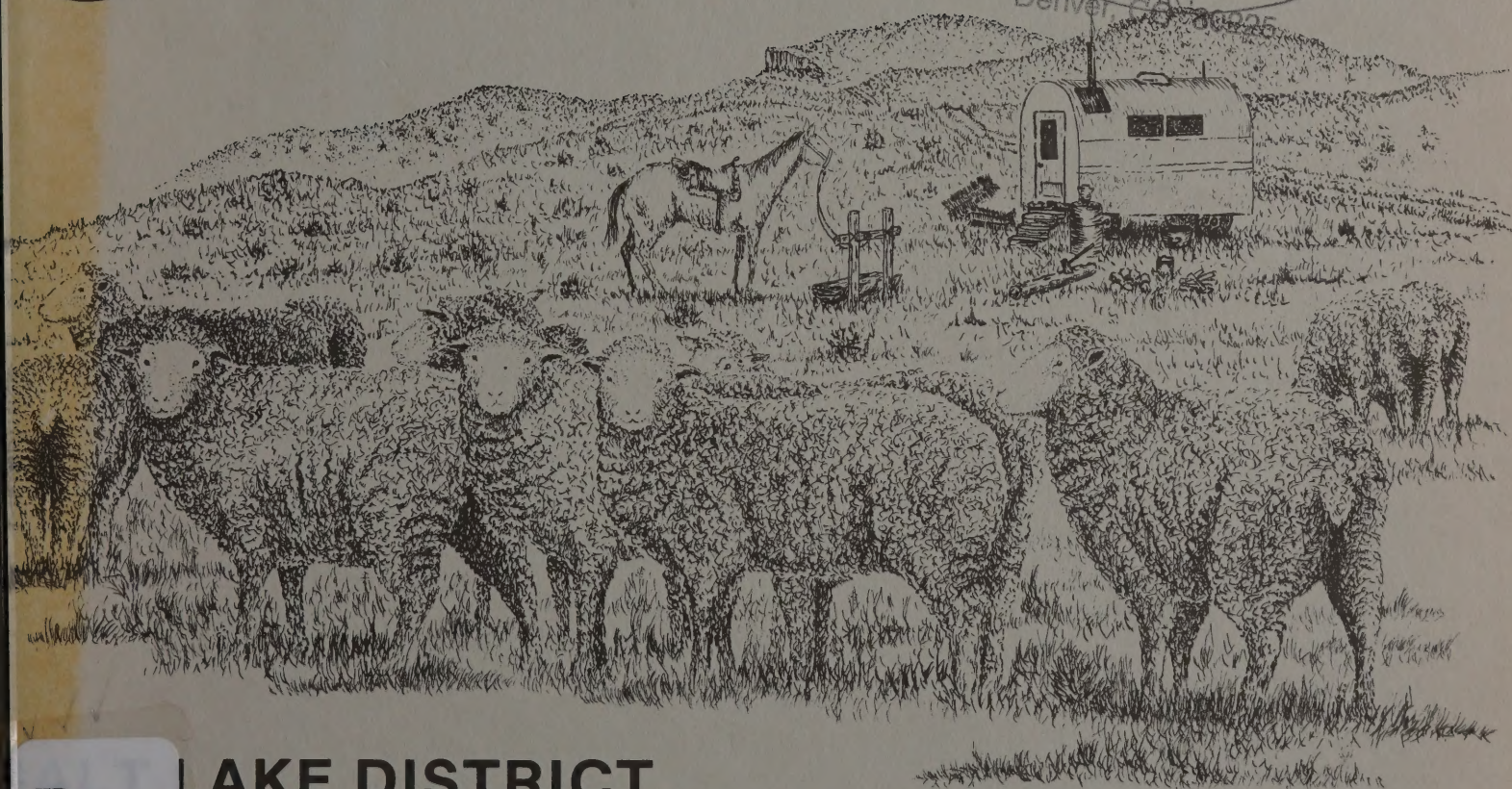
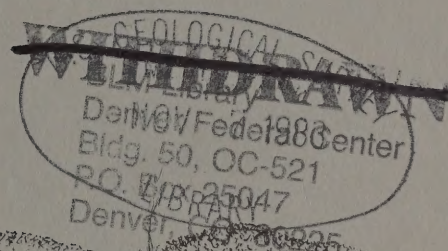




88077947

FINAL TOOELE GRAZING ENVIRONMENTAL IMPACT STATEMENT



LAKE DISTRICT

U.S. BUREAU OF LAND MANAGEMENT

U.S. DEPARTMENT OF THE INTERIOR

SEPTEMBER 1983

HD
243
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1983



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119

IN REPLY
REFER TO:

1792
(U-220)

September, 1983

Dear Reader:

Enclosed for your review is the Final Tooele Grazing Environmental Impact Statement. Decisions on the grazing management program will not be made until at least 30 days after the Notice of Availability for the document is published in the Federal Register. During that 30-day period, written comments on the Final EIS may be submitted to the District Manager, Bureau of Land Management, 2370 South 2300 West, Salt Lake City, Utah 84119.

The EIS was prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969. It is based on information from the Bureau of Land Management and other sources, including Federal, State, and local agencies, and interested private organizations and citizens. Because no concerns raised during the public comment period on the draft required major revisions of the document, the Final EIS has been prepared in an abbreviated format consistent with provisions of the council on Environmental Quality's Regulations. BLM is required to address only those comments which specifically address the contents of the Draft EIS. However, we have also addressed statements of opinion and recommendations in order to help clarify the concerns of the commentors. The Final EIS contains all comments received during the public review period, responses to the comments, and required modifications of the text. Therefore, this document should be used in conjunction with the Draft EIS.

A limited number of copies of the Draft EIS are available at the following BLM offices:

Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119
Phone: (801) 524-5348

Utah State Office
University Club Building
136 East South Temple
Salt Lake City, Utah 84111
Phone: (801) 524-4257

My staff and I are indebted to the many organizations and individuals who have participated in the land-use planning and EIS process for the Tooele Planning Area. We look forward to working with you in the future in determining how these and other public lands in the Salt Lake District can best be managed and used.

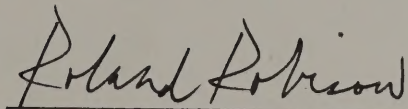
Sincerely,

Frank W. Snell
District Manager

#10167317 ID: 88077947 HD 243 266 1983

FINAL TOOEELE GRAZING ENVIRONMENTAL IMPACT STATEMENT

Prepared by
Department of the Interior
Bureau of Land Management
Salt Lake District


State Director
Utah State Office

BLM Library
Denver Federal Center
Bldg. 50, OC-521
P.O. Box 25047
Denver, CO 80225

ABSTRACT: The Bureau of Land Management proposes to revise the grazing management program for the Tooele Planning Area, Utah. The objectives of the program are to improve the condition of rangeland resources and increase forage production for multiple uses under a sustained-yield basis. The EIS analyzes the environmental consequences of four alternative grazing management programs. These alternatives are: (1) Proposed Action - No Action; (2) Emphasize Wildlife Habitat; (3) Emphasize Livestock Forage; and (4) Preferred Alternative - Balanced Use. The alternatives recommend levels of grazing for livestock, big game, and wild horses; identify rangeland improvements; and outline a schedule of implementation. A description of the affected environment and an analysis of the environmental consequences resulting from each alternative are included in this EIS.

For further information contact: Dennis Oaks, EIS Team Leader
Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119
(801) 524-5348

Comments on the Final EIS are due: October 30, 1983.

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CHAPTER 5

Consultation and Coordination

COORDINATION IN REVIEW OF THE DRAFT EIS

The Draft Tooele Grazing Environmental Impact Statement (EIS) was filed with the Environmental Protection Agency (EPA) on June 10, 1983. Its availability and the time and place for the public hearing were announced by the Department of Interior in the Federal Register on June 10, 1983. A news release was also issued to notify interested people about the comment period on the Draft EIS. August 3, 1983 was the deadline for submission of written comments.

The list of agencies and individuals who have received copies of the Draft EIS is available for review at BLM's Salt Lake District Office. The Draft EIS also contains a list of agencies from whom comments were requested. Comments were also requested from livestock permittees and interested individuals.

Public workshops were held in Vernon on June 28 and in Grantsville on June 29. The purpose of the workshops was to explain the contents of the Draft EIS and the process for commenting. A public hearing was held on July 14 at the Tooele County Courthouse in Tooele, Utah. Copies of the hearing transcript, along with the list of attendees, are available for review in the Salt Lake District Office.

All written comments and oral comments from the public hearing were reviewed for consideration in preparation of this Final EIS.

Comments that presented new data, questioned facts and/or analyses, and raised questions on issues bearing directly upon the Draft EIS were responded to by BLM. In some cases, comments which were not specific to the contents of the EIS were also responded to in order to answer other concerns of the commentors.

Decisions on this program will not be made until at least 30 days after the EPA Final Notice of Availability has appeared in the Federal Register. During the 30-day period, written comments on the Final EIS may be submitted to be considered in the decision-making process to:

District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119
Phone: (801) 524-5348

CHAP. 5 - CONSULTATION AND COORDINATION

COMMENT LETTERS

Letters commenting on the Draft EIS were received from the following organizations and individuals (letters listed in the order they were received):

| <u>Letter Number</u> | <u>Commentor</u> |
|----------------------|---|
| 1 | Peter Hovingh, Utah Nature Study Society |
| 2 | Gerald E. Gordon, Utah Wildlife Federation |
| 3 | Gene Ekenstam, Tooele Wildlife Federation |
| 4 | Marjorie Black |
| 5 | Howard Johnson |
| 6 | Daniel A. Pooele, Wildlife Management Institute |
| 7 | Dan Freed, Skull Valley Company |
| 8 | Martin Schweizer |
| 9 | Bernell and Betty Thomas Ron and Ann Alloway |
| 10 | Merrill Beckstrom |
| 11 | Gary McFarlane, Utah Wilderness Association |
| 12 | Dave Bornholdt |
| 13 | Helen Robinson, Humane Society of Utah |
| 14 | Anthony J. Frates, Utah Native Plant Study |
| 15 | Craig Smith, Utah Sportsman Riders Association |
| 16 | James Eker |
| 17 | U.S. Forest Service |
| 18 | State of Utah |
| 19 | Environmental Protection Agency |

The following section contain copies of all letters received, along with responses to the comments.

Comment Letter 1

721 Second Avenue
Salt Lake City
Utah 84103

29 June 1983

Mr Frank Snell, District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr Snell:

Concerning the Draft Tooele Grazing Environmental Impact Statement:

Although it is well documented that the arid western grazing lands have been thoroughly overgrazed in the historic past, the current intensity to "improve" the range lands is viewed by some with great skepticism. The Draft Statement refers to chain and seed, burn only, burn and seed, spray, and plow as means to remove undesirable species. Undesirable species are listed as juniper, rabbitbrush, halogeton, horsebrush, Russian thistle and snakeweed. Juniper, Rabbitbrush, horsebrush, and snakeweed are native plants that live in the Great Basin. They are only undesirable because they are not forage plants for livestock and big game animals. The juniper and the horsebrush are found in their own ecosystems with an associated populations of song birds, insects, and lizards.

Further description of these ecosystems in the Great Basin can be found in the article by Reed W. Fautin (1946, Ecological Monographs 16: 251-310, Biotic Communities of the Northern Desert Shrub Biome in Western Utah). Extracted from this article is the association of the Collard Lizard, desert pack rat, white footed mouse, long tailed pocket mouse with the Tetradymia-Atriplex ecosystem. These species are not found in the greasewood, sagebrush, or shadscale ecosystem. Likewise Tetradymia contains a great abundance of insects during the flowering time (Hemiptera and Thysanoptera). This abundance of insects occurs during the nesting season of many of the song birds.

In the greasewood and sagebrush ecosystem (tall shrubs) one finds the Green-tailed Towhee, Sage Thrasher, shrikes, Sage Sparrow, Brewer Sparrow, Harvest Mouse and Sagebrush Lizard. These species require the tall shrubs. Further the Wasatch chipmunk and the Great Gasin Pocket Mouse are found in the sagebrush ecosystem and not in the greasewood ecosystem.

Horned Larks nest in the open country and the desert Black-throated Sparrow nests are restricted to the Tetradymia community. Townsend's Ground Squirrel is active only during the spring while all the vegetations are lush.

By changing the sagebrush and the horsebrush and the juniper, one will destroy the habitat of the native song birds, insects, mammals, and reptiles. If one

Comment Letter 1

-2-

destroys the vegetation during the spring, one is destroying much of the desert during its most productive time of the year, March through June.

A second management problem in the Great Basin arises when one studies the biological processes that occur in each valley and each range. These processes consist of speciation of animals (mammals and reptiles in particular) and plants (See Howard C. Stutz, C. Lorenzo Pope, and Stewart C. Sanderson, 1979, American J. Botany 66: 1181-1193. Evolutionary Studies of Atriplex: Adaptive products from the Natural Hybrid, 6 N A. tridentata x 4 N A. canescens). Unique plants and animals may have evolved within a valley or on a mountain range that are especially adapted to a small area. Range improvements in the past have not been concern with the uniqueness of a region, only the amount of forage material for livestock and big game. The ecological studies have not yet been started which takes in account the identification of new species of Atriplex and their evolutionary radiation into one valley or one elevation of one valley.

With the above perspective as background, Utah Nature Study Society would recommend that before any manipulation as spraying, chaining, burning, or plowing occurs that the Bureau of Land Management study the populations of songbirds and rodents in the area to be manipulated. Continued studies should occur for ten years with studies on both the manipulated area and the control area adjacent to the region.

Utah Nature Study Society would also like to know the dietary habits of the rodents in the Great Basin. The Great Basin ecosystem evolved in the absence of large game mammals and livestock. The rodents and insects are the major herbivores in the Great Basin. It seems that before one assigns a given number of animal units to a given allotment, one should know just what the native rodents are doing.

In reading the Draft Environmental Impact Statement, there was no mention of the rest-rotation form of range improvement. Perhaps I missed this. It seems that rest-rotation form of range improvement should be assessed along with the physical destruction of the present range for range improvements. Likewise, there was no policy on spraying for insects and coyote and rodent control programs. The cost of the different range improvements should be estimated and presented. Likewise the cost of animal control programs should be estimated and presented. It is of my opinion that some ranges that have been physically improved now need further spraying or improvements. The Draft Statement should include a comment on how often these improvements need to occur, and the ecological succession that happens during these events.

With 50% of the grazing fees returning to the Bureau of Land Management for range improvements, there seems to be much pressure to spend this money whether or not the improvements are needed. In the Great Basin where the ecosystem is continually evolving since the desication of Lake Bonneville and other pluvial lakes, Utah Nature Study Society urges extreme caution in all manipulations and improvements.

Sincerely,

Peter Hovingh, President
Utah Nature Study Society

Response Letter 1

- 1.1 Although some impacts to songbirds and rodents would occur in treatment areas, no significant impacts to the populations would be expected because the juniper vegetative type covers extensive portions of the planning area. Juniper invasion of sagebrush dominated areas eventually leads to a dense stand of juniper with little or no understory vegetation. Land treatments such as spraying, chaining, burning and plowing are used to increase the abundance and variety of vegetation, making these areas more suitable for a greater number of wildlife species.
- 1.2 Grazing of vegetation comes from several sources, including livestock, big game animals, and a variety of other wildlife species such as rodents. Yearly utilization studies are conducted to measure the cumulative impacts of all grazing species on the vegetative resource. Total utilization is considered when allocating forage to big game and livestock.
- 1.3 Rest-rotation grazing is one of several grazing systems that are widely used to improve range condition. The grazing system selected for a specific allotment is determined by the type of vegetation and its needs, as well as season-of-use, type of livestock, climate, and other factors. As stated on page 14 of the Draft EIS, the type of grazing system will be determined in Allotment Management Plan (AMP) development. The impacts of grazing systems will be analyzed when an environmental assessment is prepared for each AMP.
- 1.4 The questions of policy for insect and animal control programs, as well as the cost of animal control and rangeland improvements, go beyond the level of detail required for this EIS. BLM policy requires a cost/benefit analysis on each rangeland improvement before it is included in the budget for each year. This policy includes retreatment of existing improvements.

Comment Letter 2



UTAH
WILDLIFE
FEDERATION

POST
OFFICE
BOX 15636

SALT LAKE
CITY, UTAH
84115

11 July 1983

Mr. Frank Snell
District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah

Dear Mr. Snell,

Even though the Utah Wildlife Federation totally supports the multiple land use concept, we believe there is a great imbalance of public land usage between big game animals and domestic livestock with the pendulum in favor of livestock. It is for that reason that this Federation must endorse Alternative Number 2, Emphasize Wildlife Habitat.

2.1

In developing the plan, we recommend that the climatic catastrophes caused by last years long winters deep snow and subsequent flooding and range fires be considered. We recommend that consideration be given to adjusting livestock AUM's to prevent overgrazing of the already damaged range land until range conditions are improved.

2.2

We also recommend that when the ranges are improved, less use be made of the traditional crested wheat grasses and the other grass species. We recommend planting of succulent vegetation which is highly palatable to deer and elk. Such improvements should then be a meaningful buffer between agricultural and big game winter habitat areas by producing succulent forage as palatable and inviting to game animals on public land as found on private alfalfa fields. Such improvements should significantly reduce depredation of private agricultural crops by big game animals which was discussed as a problem in the EIS.

2.3

We commend the BLM for the initiative taken to study this Tooele area for improvement. We hope that the interests of the organized sportsmen will be considered in the development of the improvements. Judged by the sales of hunting permits, fishing licenses and the registers kept at public and State camp grounds there are about 500,000 Utahns enjoying wildlife and participating in related activities. Accordingly, we request that the BLM respond to interests of the majority of public land users in developing the Tooele grazing plan.

Thank you for the opportunity to comment on this important issue.

Sincerely,
Your friend in conservation

Gerald E. Gordon

GERALD E. GORDON
President
Utah Wildlife Federation

DEDICATED TO THE CONSERVATION OF OUR NATURAL RESOURCES

- 2.1 The fluctuations in annual precipitation are accounted for in the annual utilization and actual use studies conducted by BLM. In this way, an average grazing capacity is determined and takes use in both wet and dry years into consideration.

BLM is authorized to adjust or temporarily suspend livestock use on areas which have been burned. Each burn is evaluated for rehabilitation opportunities, as well as its impact on future grazing of the area; changes in the grazing plan are made as necessary.

BLM range studies indicate that 148,612 AUMs are available for use on the public lands within the planning area (see page 22 in the Draft EIS). BLM regulations mandate that this amount will not be exceeded, and future decisions will assure that the grazing capacity of the allotments are not exceeded. Alternatives 2 and 4 allocate forage at or below the grazing capacity for each allotment. (See Appendix 1, page 82 and 84 in the Draft EIS.)

- 2.2 Land treatments, including seedings, are seldom done for wildlife benefits only. Most treatments are a joint effort to improve habitat quality for both livestock and wildlife species such as deer and elk. In some areas, private land has been cleared and seeded with crested wheat. BLM policy is to seed treated areas with a variety of grass, forb and browse species depending on the soil type and climatic zone of the area. Chainings and other land treatments are also designed to leave areas or islands of vegetation to maximize edge effect and provide cover and travel corridors for wildlife species. The improvement of the natural habitat should help reduce the depredation of agricultural crops.
- 2.3 As a multiple use agency, BLM responds to the interests of all public land users. During the planning and writing of this EIS, the interests of recreationists were taken into account and will continue to be considered during the decision-making process.



Tooele County

Wildlife Federation

BOX 223 PHONE 882 2345 TOOELE, UTAH 84601

July 13, 1983

Dennis Oaks EIS Team Leader
Salt Lake District Office
2370 So. 2300 West
Salt Lake City, Utah 84119

Dear Mr. Oaks:

Tooele Co. Wildlife Federation representing some 22,841 hunters and others, who use all types of recreational and hunting resources in Tooele County, strongly endorse Alternative Number 2 to emphasize wildlife habitat in the Tooele Grazing Environmental Impact Statement.

Our rationale for this recommendation is due to:

1. Sage Grouse range, strutting and nesting grounds are rated from "fair" to "low" and "poor" conditions. The hunting season for Sage Grouse has been closed this year because of these range conditions. (See table 3-10 and 3-11)
2. We strongly support the re-introductions of Elk and Bighorn in Stansbury and Deep Creek ranges. These animals will have little or no effect on grazing livestock. Because much of the land used by wildlife is not considered in range studies by the BLM because of terrain or other land features.
3. We support the re-introduction of Pronghorn Antelope in Rush Valley.

We feel that a major part of the land in Rush Valley is not suitable farmland due to lack of water and irrigation. We feel Antelope would have little or no effect on present farming in that area. If more agriculture is introduced it would have a devastating effect on Raptor populations of which Bald Eagles are listed as endangered.





Tooele County

Wildlife Federation

BOX 223 PHONE 882-2345 TOOELE, UTAH 84074



4. (See Table 3-8 page 37 EIS) Three out of five areas show that range for deer (Our prime wildlife resource) is on a downward trend. (See Table 4-2 page 74 of EIS) Alternative #2 shows 86% active preference for livestock. We feel that even these percentages would not change range condition trends. The remaining 14% is a small price to pay to start bringing range conditions back to optimum for both livestock and wildlife.
5. We represent many people concerned about recreational and visual resources. These resources bring business and financial wealth as well as aid economically. Tooele County with its vast acreage must enhance its natural and recreational resources.



We commend the BLM and its people for this study of improvements in the Tooele area. We hope that the interests of organized sportsmen and women will be considered in the improvement programs. We request that the BLM respond to the majority of public land users in the development of this Tooele Grazing Plan.



THANK YOU for this opportunity to have our input voiced,

Gene Ekenstam
Gene Ekenstam, President

TOOELE CO. WILDLIFE FEDERATION



July 22, 1983
P.O. Box 19
Vernon, Wt. 84080

Frank Snell
B.L.M.
2370 S. 2300 West
S.L.C., Wt. 84119
Dear Sirs:

I am writing to comment on the Draft Tooele Grazing Impact Statement. Sheeprock Creek is not a stream which runs year round. Many years it doesn't come to the Sheeprock Narrows.

4.1

It certainly doesn't have potential for stocking fish. Many years it only has the spring in the head of the canyon. I have lived on the Shaker Ranch since 1930 and I have seen many more years when there wasn't water than when there was.

4.2

I have Patented Mining Claims (11) on the Simpson Mountain in Indian Canyon where you have designated Riparian Habitat. Does this adversely

g.

4.2
cont.

effect the claims? This is private owned ground. I expect to be able to go to the claims at will. The Patent Survey Numbers are 6268 ~~and~~ 6269.

Yours truly

Marjorie (Elder) Black
P.O. Box 9
Vernon, Utah 84080

4.1 The information provided will be considered in making the final land-use decisions.

4.2 Patented mining claims on private property would not be affected.

Comment Letter 5

Frank Snell
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah, 84219

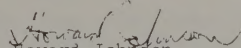
Dear Sir:

On page 69, under the heading "Fish", of the Draft
Tooele Grazing E.I.S. it states that the potential exists
to stock fish in Judd and Aspen Creeks.

5.1

The water in Judd and Aspen Creek is a privately
owned water right, which is used on land owned by myself
and may be turned off from going on down on the BLM
at any time.

I therefore, suggest that these two streams are
unsuitable as fisheries..


Howard Johnson
Delta, Utah

Response Letter 5

5.1 The information provided will be considered in making the final land-use
decisions.



Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. LAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

July 26, 1983

District Manager
Bureau of Land Management
Salt Lake District
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Sir:

The Wildlife Management Institute is pleased to comment on DRAFT TOOELE GRAZING ENVIRONMENTAL IMPACT STATEMENT, Utah.

Wildlife is recognized in the plan and some improvement is provided. However, the costs to the United States are too high. The improvements could be achieved by livestock reductions and a greatly reduced amount of fencing and brush chaining. These public benefits could be achieved without a subsidy to 117 livestock operators that we estimate will exceed an average of \$17,000 each.

You list many range developments but include no estimated costs of those developments. Therefore, we examined the most recent Utah grazing statement that did include costs of range improvements and have made a comparison with the work projected on Tooele where we estimate the costs will be in the neighborhood of \$2 million.

| Improvement | Henry Mountain | Tooele |
|------------------------|----------------|--------|
| Springs | 18 | 19 |
| Reservoirs | 119 | 27 |
| Pipe Line (miles) | 57 | 60 |
| Troughs | 38 | |
| Wells | 8 | 30 |
| Corral | 1 | |
| Fence (miles) | 17 | 184 |
| Cattle Guards | 2 | |
| Land Treatment (acres) | 2,975 | 38,156 |

Cost Our
Given \$1,375,900 Estimate \$2,000,000

DEDICATED TO WILDLIFE SINCE 1911

-2-

July 26, 1983

6.3

The casual reader would assume that most alternatives make a reduction in livestock numbers. That is not so. Operators have found it possible or necessary to use only 112,797 of their 119,520 active preference AUMs. Only Alternative 2(Emphasize Wildlife) is less than that present use, 112,797 AUM. The others equal or exceed it. There is no actual cut in use.

6.4

The 38,156 acres of land treatment will produce only 5,364 more AUM of which only 3,391 will go to livestock use. Grazing fees will be far less than the interest the United States pays on money used for development.

Livestock is often a money-losing proposition on the Tooele area. Operators with "low requirement" for BLM land lose over \$16,000 a year, while those with "medium requirement" for BLM land earn only \$16,000 a year (Table 3-14).

"Most families have outside employment which in many cases exceed the net income from livestock operations" (Page 53).

We suggest that under these subsidy conditions of noneconomic industry, range improvements be undertaken only for public benefits, such as wildlife. Any improvement funds left could then be used to purchase ranches and retire grazing preferences, reversing the trend of more than 100 years of range abuse, and increasing wildlife recreation, which in many areas brings more money to counties than does livestock.

6.5

Reference is made to the Utah Division of Wildlife Resources' "prior Stable Levels" of wildlife numbers. The statement that this plan will meet such numbers should be validated by including a table of wildlife populations. We also wonder where the land treatments will be located in relation to critical habitat and what the effect of the treatments will be.

6.6

Will the Utah Division of Wildlife Resources have a part in monitoring this plan? They should be active participants.

6.7

We note that in three places (page 52, page 77, page 79) the capital value of Public Grazing AUMs is recognized. Since BLM does not, or at least is not supposed to, recognize such values, there should be some strong disclaimer statement.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:1bb

- 6.1 Proposed rangeland improvements for the Tooele Grazing EIS were designed to benefit all rangeland resources (e.g., watershed, soils, water quality, wildlife, etc.). (See page 11, Description of the Alternatives in the Draft EIS.) BLM, under the Federal Land Policy and Management Act of 1976, is mandated to manage and protect range resources and uses; the improvement projects have been designed accordingly. For these reasons, the public expenditures for these projects are not solely for the benefit of the livestock operators but for many uses of the public lands, some of which take in no revenue.

The working life of the proposed projects is from 10 to 20 years. During this amount of time, the medium dependency sheep rancher would pay from \$26,000 to \$52,000 in grazing fees, and the medium dependency cattle operators would pay from \$15,500 to \$31,000 in grazing fees. These estimates are based on today's AUM cost of \$1.40. With approximately 60 percent of grazing fees used for rangeland improvements, many of these projects would be paid for indirectly by the permittees.

Areas proposed for treatment are heavily dominated with juniper and/or sagebrush. If not treated, these sites would remain in this state or have further juniper invasion whether or not livestock were removed. These dense juniper stands are the natural climax vegetation on many of these sites; only fire would return these sites to an earlier successional stage. Areas that have become dense with juniper have little understory and thus will not naturally burn. Left untreated, these sites would remain unproductive and benefit neither livestock nor wildlife. In addition, dense stands of juniper increase surface runoff and soil erosion. This soil loss leads to the loss of the site's potential to produce quality vegetation. Removal of these dense stands would return these sites to an earlier stage of succession and benefit all resources involved.

- 6.2 Cost estimates and cost/benefit analyses for individual projects will be prepared during AMP development. Rangeland improvements are costly, and the decision to develop individual projects will be based on available monies and the cost/benefit ratio. Some of the proposed projects may not be accomplished for many years, if ever. New, less costly, or more beneficial projects may be identified in the future to add to or replace projects as analyzed in the EIS. These new projects would have environmental assessments prepared prior to implementation.
- 6.3 On a planning area basis, no alternative analyzes a level of livestock numbers below current use (see Appendix 1, pages 81-84). There are several reasons for these levels. Several permittees on large allotments such as Clifton have elected to take nonuse for several years. In addition, due to poor livestock prices, some permittees have not found it profitable to use their entire permitted use or are interested in limiting their use to improve the range. This nonuse taken by these permittees outnumbers the total amount of AUMs that may need to be reduced on several allotments within the planning area.

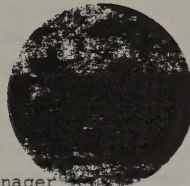
To reference the allotments analyzed for reductions from current use, refer to the livestock grazing sections in the Draft EIS on pages 73 through 76 or Appendix 1, pages 81-84. Also refer to Response 6.1.

- 6.4 Refer to Response 6.1.

- 6.5 Within the EIS, wildlife numbers and AUMs fluctuate by alternative. Under Alternative 2, big game numbers would be at or above UDWR's prior stable or objective levels in all allotments. In each of the other three alternatives, forage was provided to big game or livestock based upon the goal of that alternative as described in Chapter 2. Under these three alternatives, UDWR prior stable and objective levels may or may not be met in any given allotment. A table which has been added to the Appendices shows estimates of prior stable numbers by herd unit (see Revisions and Corrections for page 87).

Plate 2, which is inserted in the back of the Draft EIS, shows the locations of the proposed land treatments. By comparing Plate 2 to Figures 3-3 through 3-5, the relationship of land treatments to the crucial range of the various big game species can be determined. AUM increases from land treatments are identified by alternative in Appendix 3 on page 86. AUM increases for each species are discussed in the text of Chapter 4 under wildlife in the Draft EIS.

- 6.6 A Memorandum of Understanding signed by the State Director of the BLM and the Governor of Utah states that BLM and UDWR will cooperate in the conservation, restoration and management of public land and the wildlife and fisheries resources contained on this land. The exchange of data between the two agencies is an ongoing process and played an important part in defining wildlife crucial habitat and potential treatment areas, as well as in forming population estimates for the big game species in the planning area. UDWR concerns and interests have been taken into consideration throughout the planning and EIS process and will be incorporated into the rangeland program summary which will contain the grazing decisions. BLM will continue the relationship with UDWR as the grazing decisions are implemented and monitored, including the continuance of big game studies and the cooperative formulation of herd management plans.
- 6.7 It is common knowledge in the livestock industry and lending institutions that BLM does not recognize the capital value of public AUMs. A statement to this effect has been added to the ranch-related economic section in Chapter 3. (See Revisions and Corrections for page 52).



**Skull Valley
Company**

531 SOUTH STATE, SALT LAKE CITY, UTAH 84111
TELEPHONE 355-6239
Aug 1, 1983

Mr. Frank Snell, District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, UT 84119

RE: DRAFT TOOELE GRAZING ENVIRONMENTAL IMPACT STATEMENT

Dear Sir:

Responding to letter number 1792 (U-210), we wish to comment on several points. Our comments are as follows.

1. We favor the given alternatives in this order:

- First; alternative 3
- Second; alternative 4
- Third; alternative 1
- Fourth; alternative 2

2. We have a strong disagreement with the assessment (ref: p.28, "Skull Valley") of the rangeland. The column of "Range Trend" lists the Skull Valley range as declining. Our difference of opinion is concurred by the following list of rangeland experts.

- Mr. Maurice Brown; report and photos attached
- Mr. J. Stanley Peters, appraiser; opinion attached
- Dr. A. C. Hull, A R S retiree; letter attached
- Dr. F. B. Gomm; letter attached
- Dr. Neil Frischknecht; (Provo) 373-7494 or 377-5717
- Dr. James Blaisdell; (Ogden) 393-7562
- Dr. Ralph Holmgren; (Provo) 373-3041
- Dr. James Bown, U S U; letter attached

Evidences of an improving, rather than declining, trend were cited by Dr. James Bown. He viewed some of the bench areas and commented on the abundance of both cool season grasses such as Western Wheat Grass and Needle-and-Thread, and warm season grasses such as Sand Dropseed. He opined

-2-

7.1
cont.

that these plants demonstrated an improving condition. He also noted the Desert (Grey) Molly (L: Kochia Americanus) and Seepweed (L: Suaeda) in the lower parts of the valley, believing these plants also verified an improving condition.

7.2

3. We also have disagreement with the given percentages of "good", "fair", and "poor" (ref: p.28, "Skull Valley") range conditions. We think a more accurate assessment of condition should consider approximately:

- Good---94,000 acres, or 35%
- Fair--134,800 acres, or 50%
- Poor---40,000 acres, or 15%

The total acreage listed as the possible Wilderness Area, along with other improved acreage, should be considered in the "good" category; hence the net change upwards in all categories.

4. Our Allotment Management Plan has been devised with the great help of Mr. Gary Kidd. It now awaits approval from the B L M, and the necessary fences. The allotment requires a fence across Skull Valley from Section 30, T 3S, R 9W; to Section 30, T 3S, R 8W. This fence divides the valley range into units we can manage, to benefit the land. The west side of Cedar Mountain would be one unit. South Skull Valley would comprise another unit, leaving north Skull Valley as the third unit.

Each year, one of the areas would be cleared of stock on 1 April, instead of the usual 1 May. This action would allow for full vegetation growth for that year. Use for 1 May would be comprised of much private land, but would also include the Salt Mountain, Delle Ranch, and Muskrat units in Skull Valley. The North Well unit would be used on the west side of Cedar Mountain, the North Well unit would be the grazing area beginning 1 May. Naturally, approval of the A M P will precede everything; then we hope the fences can

-3-

be built as soon as possible.

7.3

Our request is to start the main winter grazing date on 1 December, using the area sparingly from 1 November to 1 December. The season would then run through 30 April. At that time we would move to our private lands and specific units mentioned in the preceeding paragraph.

5. Most of the wild life, including the "wild" horses, impact on our rangeland to some extent. For this reason, each group is covered in one of the following subheadings; since our comments concerning each subject may or may not differ with the opinions stated in the Tooele E I S.

A. "Wild" Horses (p.31). We agree with the way the B L M is controlling the herds, recognizing a great need to keep their numbers down. If the herds grow too much, they could prove not only a hazard at Dugway, but deleterious to indigenous game animals. Excessive growth also complicates prudent management.

B. Mule Deer and Elk (p.34). We agree with the B L M's prudent handling of the elk situation, as well as the mule deer. The mule deer winter on a great deal of our private range, especially where we have made land improvements by chaining and reseeding. This region is their natural habitat and one in which they have wintered for many years. For this reason, we are comfortable with the large numbers of mule deer on our range. However, we cannot favor wintering elk on our lands because it would put too heavy use on areas we are improving.

C. Pronghorn Antelope (p.34). Some of the pronghorn antelope have been sighted on our ranges. We have no objections to the antelope on our ranges, as they are not destructive of the improvements we

-4-

are effecting.

D. Rocky Mountain Bighorn Sheep (p.40). The importation of bighorn sheep could affect us since one of the proposed sites falls into our range area. We think the areas most attractive to these animals would be locations away from our critical pasturage. Because of this reasoning, we feel easy accepting the judicious importation of bighorn sheep.

E. Fowls (pp.40, 43). We feel very content with the dispersion of fowls throughout the Skull Valley region. We appreciate the B L M's stand on encouraging raptors, since the birds effectively control the rodent population. We find much favor in the possibility of reintroducing sage grouse to the area. We judge it best to allow the waterfowl to use their habitats in the natural forms, since the long-range effects of artificially developed places are not very well-studied in our valley. Related to this concern is our stand on the development of the Horseshoe/Kanaka/Delle Springs complex. We would hope for some judicious enhancement of the Horseshoe Springs area, but as both Kanaka and Delle lie in our most used pasture grounds, we believe the drawbacks of development there outweigh the advantages.

F. Fish (p.43). We are highly in favor of developing the Horseshoe Springs area for fishing.

7.4

6. Lack of reasonable control over recreation poses one of the gravest problems on our allotment. It appears, at present, virtually all recreational use is deleterious to the ecological balance in Skull Valley. Some of the problems are overt--history after history of accidents, with an average of one death per year in the last ten years. We, as live-

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cont.

stock owners, are exposed to losses caused by recreationalists ignorant and unaware of livestock and its vulnerabilities. It is unfortunate that many recreational vehicles cause such erosion and injury to the land in their owners' pursuits of fun and enjoyment. This destruction becomes even more serious in areas such as the desert's fragile eco-system. Unfortunately, patrolling is impossible in large spaces such as our allotment. Less obvious concerns stem from the injudicious ways many people use to gain access to a coveted area for backpacking or photography. Summing the problems, the solution appears to lie in restrictive usage. We regret the conclusion as much as anyone, but as in the case of most rules, the restriction of the many comes about by the actions of the few.

7.5

7. The terrible calamities occurring this year have underscored the need for the establishment of firelines. During good years, such as this one has been, the necessity is especially critical in order to protect fences, feed, and animals. The terrain in the area covered by the Tooele E I S is very vulnerable to fire--firelines are about the only way to protect the land.

7.6

8. We hope to receive aid in developing small reservoirs and other forms of water storage to benefit both livestock and wildlife. Much of the continuing improvement of our range would be greatly facilitated by utilizing our limited water resources in an optimal way.

7.7

9. Being concerned stewards of the land, we are always planning for optimal range improvements. The need for fences has already been mentioned. The fences on B L M ground we have built, or participated in building; help and cooperation in maintenance would be much appreciated. Also, since 1934, the B L M has benefitted the Skull Valley Allotment by just three things. They are: (1) reseeding 250 acres, (2) building the

7.7
cont.

southern fence, and (3) providing labor on the railroad fence. The sum total of all our years of grazing fees has helped us in just these three areas. It would certainly seem that further B L M improvements would be in order--thus matching more closely the benefits rendered to other allotments.

We would like to reassure everyone of our continuing cooperation in developing the Skull Valley rangelands. As always, all those who aid in improving our allotment have our utmost cooperation and appreciation in return.

Exercising our stewardship wisely, we believe we can achieve our goal of making the Skull Valley Allotment one of the best winter ranges in the United States. We can meet our dream with the concurrence from different governmental agencies and other knowledgeable parties. After all, range improvement is in everyone's best interest.

Very truly yours,

Daniel G. Freed
Daniel G. Freed
Partner, Skull Valley Company

DGF/lf

7.1 Due to the lack of established and regularly read trend studies, the estimate of trend on the Skull Valley Allotment was determined by field inspections by BLM's area range conservationist. Since the estimate was made, old trend studies have been reread and more allotment inspections have been made by you, BLM personnel, and the individuals whom you've mentioned. This new information indicates an upward trend in some areas. For this reason, the estimated downward trend on the Skull Valley Allotment has been changed to not apparent. (See Revisions and Corrections for page 28.) Continued trend studies and allotment inspections should allow BLM to determine the trend on this allotment soon.

7.2 Livestock grazing occurs on much of the Wilderness Study Area within the Skull Valley Allotment. The WSA is not considered to be entirely in the good range condition class. Also, not all portions of the improved acreages you mention are in good condition. A. C. Hull (1983) and James Blaisdell (1983) have been on recent inspections and agree with the estimated percentages of range condition for the Skull Valley Allotment as shown on page 28 of the Draft EIS.

Because allotment inspections and studies continue to support the estimates of range condition presented in the Draft EIS, no change has been made.

7.3 Your comment has indicated two errors in Appendix 2, Seasons-of-Use, in the Draft EIS. A change has been made to include the winter cattle use on Skull Valley Allotment in Alternatives 1 and 3. In addition, the proposed season-of-use for Skull Valley Allotment in Alternative 4 has been changed to winter use as specified in your comment because of the allotment's natural suitability for livestock winter use. (See Revisions and Corrections for page 85.) Because these revisions do not affect the analysis of spring grazing on Skull Valley Allotment, no changes have been made to the text of Chapter 4.

7.4 The purpose of this EIS is to assess the effects of grazing on other resources within the Tooele Planning Area. The impacts of other uses, such as recreation, are considered during the land-use planning process and described in the Tooele Management Framework Plan (MFP). As a result of the analysis in the Tooele MFP and public input, a decision was made to limit off-road vehicle use in some portions of Skull Valley, including the Horseshoe Springs area, foothills of the Stansbury Mountains, crucial deer winter range, and antelope fawning grounds. A description of the types of restrictions in each area can be found in the Tooele MFP, available for review at BLM's Salt Lake District Office.

7.5 Fire management was identified as an issue during the land-use planning process for the Tooele Planning Area. The decision for fire management was to continue the modified suppression program that has been developed in the past 2 years. This plan calls for full suppression of all fires threatening human life, substantial property, or improvements and all fires within the salt desert shrub type. It leaves the opportunity for fire line construction open for consideration. Such a program would be costly, time consuming, and may not be successful because of the highly flammable nature of the cheatgrass. For these reasons, fire line

construction has not been done in the past. However, fires such as those which occurred the past 2 years in Skull Valley indicate that a fire line program may be effective; therefore, fire line construction may be considered in the future.

Additional decisions for the fire management program are available for review at BLM's Salt Lake District Office.

7.6 Appendix 3, page 86 in the Draft EIS lists the proposed rangeland improvements. Proposed water developments on the Skull Valley Allotment include three springs, two wells and two reservoirs. In addition, 5 miles of pipeline to distribute the water throughout the allotment were identified. These developments, as well as the land treatments and fences, have been identified by a BLM interdisciplinary team. BLM would appreciate your time and cooperation in the design, location and construction of these developments and suggestions for other needed developments on your allotment.

Construction of rangeland improvements are dependent on money made available both by grazing fees and special monies appropriated by Congress. As funding is reduced, less improvements can be done and prioritizing of these improvements must occur each year. The prioritizing of rangeland improvements takes into account many factors, including a benefit/cost analysis, the feasibility of the project, and the probability of success. Water development projects have been of high priority within BLM's Salt Lake District Office because of their proven success in improving the range resource.

7.7 Available federal funds will probably never match the need for rangeland improvements in the Tooele Planning Area. For this reason, rangeland improvements are prioritized each year (see Response 7.6). In addition, allotments that have had AMPs developed in the past have had money appropriated to implement the management plan.

Rangeland improvements will continue to be prioritized in the future and every effort will be made to use the available money in the most cost effective manner and as equitably as possible.

Martin P. Schmeizer, Ph.D.
300 St. Monty St. N.E.
Summit Park, UT. 84060

July 24, 1983

Frank Snull, District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

R.E. Draft Tools Grazing EIS, 6/83

Dear Mr Snull:

Thanks you for the opportunity to comment on the referenced plan.

8.1

My general evaluation of the BLM preferred alternative #4 is that this "balanced use" proposal is in reality a plan to expand forage for sheep-grazing interests, primarily with secondary consideration for cattle grazers, minimal consideration for wild life and natural resources. Such a conclusion is readily attained simply by examining Table I, p 2 with respect to individual AUM's and the total AUM's. Plan #4, compared to #1, essentially embraces the idea that livestock forage should be preferentially increased, mainly for sheep (note the expansion in operations and allotments in Table 2-4, p19). Plan #4 is actually quite similar to #3, the stated livestock grazing enhancement. In essence, the BLM proposes to use public funds to facilitate and enhance commercial interests on public lands, making a mockery of the "balanced" or multiple use concept. Although this philosophy is standard with the current administration, I for one, do not want my tax dollars used in this fashion.

- 2 -

8.2

In light of huge budget deficits, the idea of investing millions of tax dollars into permanent alteration of 38,156 acres for the benefit chiefly of sheep and cattle interests at the expense of the natural resources is somewhat ludicrous. Besides the obvious irreversible alterations ("improvements") the proposed land treatments cause to native vegetation and wild life systems, to unwittingly scars on the natural landscape, your agency really should be more realistic in assessing the potential permanent soil erosion possible as a result of these actions if the current wet weather cycle continues (p79).

I would propose that the BLM management plan consist of a modified alternative #1 in which the overgrazing problems listed in Table 4-1 (p57) be addressed by 1) adjustment of allowable animal densities; 2) redistribution of allotments. I see no reason why bighorn sheep cannot be introduced into North Deep Creek and North Starvation USA's under alternative #2; after all, these animals would inhabit different areas than the domestic grazers, so overutilization should not be a problem.

I appreciate the opportunity to comment on this document and request that my letter be made a part of the final EIS. Thanks you.

Sincerely
Martin P. Schmeizer, Ph.D.

8.1 Alternative 1 is based on livestock actual use, which is below current active preference. Data shown in Appendix 1 identifies that current active preference would be reduced by 6,723 AUMs in Alternative 4.

8.2 The proposed rangeland improvements were designed using an interdisciplinary approach and would serve multiple uses in addition to livestock. Wildlife, for example, would benefit from new or improved water sources and improved habitat that would result from a proper mix of browse species in treated areas with adjacent escape cover. Improvement design would include protection or enhancement features for visual resources, recreation and cultural resources. The funds for improvements are largely derived from grazing fees charged to livestock operators and are further supplemented by the permittees' labor and direct cost sharing for materials.

The proposed rangeland improvements would be designed to minimize erosion and achieve effective revegetation. Treated land would experience increased ground cover and erosion protection would improve over pretreatment condition. A continuing wet weather cycle would be highly beneficial to the revegetation of treated areas.

Box 3
Vernon, Utah
July 21, 1983

Frank Snell
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah, 84119

Dear Sir;

We are writing to make the following comments on the Draft Tooele Grazing Environmental Impact Statement.

1. Sheeprock Creek on the Cottonwood East Allotment has been identified as riparian habitat and designated as having a potential for stocking fish. This is to state that Sheeprock Creek is not a year around stream. The last few wet years it has run down out of the canyon all year but, generally, it dries up in the summer to the point where it doesn't come much below the narrows of Sheeprock Canyon. On some years it dries up as far up the canyon as the forks, thereby not reaching BLM administered land at all after mid-summer.

Marjorie Ekker Black has lived on the Ekker Ranch near Sheeprock Creek for 53 years and, along with ourselves can testify to this fact. We are, therefore, asking that Sheeprock Creek not be considered as suitable for stocking fish because it does not have an adequate supply of water on most years.

2. On page 28, table 3-2, Range Condition and Trend, the trend for the Cottonwood East Allotment is listed as not apparent. We'd like it known that due to cooperative management between ourselves, as permittees, and the B.L.M. and U.S.F.S this allotment has improved to the point that we are now resting 1/3 of it each year. One area has been burned and seeded and resting its 3rd year now changing it from juniper and sagebrush to crested wheat and native grass (in Pasture #5, Cottonwood East Allotment). Another area has had brush sprayed and is resting its 2nd year now (Pasture #4 Cott. E. Allotment). We feel that these improvements coupled with the achievement of resting 1/3 of the allotment each year should indicate to you that the range is improving.

Thankyou for your consideration.

Yours truly,

Bernell and Betty Hansen
Ron and Ann Alamy

9.1 See Response 4.1.

9.2 The Cottonwood East Allotment was placed in the not apparent trend class for several reasons. First, this allotment and the Cottonwood West Allotment have recently (December, 1981) been divided and had their preference reduced. It was evident, based on the data provided by BLM and U.S. Forest Service, that the forage was not available to meet the allocation. Second, recent treatments will provide additional forage; however, since the allotment division and re-adjudication, a complete grazing cycle of rest, early use, and deferment has not been completed. Third, trend data have been taken under the old grazing system and do not indicate the effects of the current system on the range resource. For these reasons, the Cottonwood East Allotment has been placed in the not apparent class.

BLM appreciates your cooperative efforts toward improving the allotment. The improvements and continued good range management should result in an improving trend.

*Goelb Draft Environmental
Impact Comments.*

Dear Sirs

7-27-83

As a permittee on the West Loopout Allotment and as a member of the Advisory board I would like to make the following comments on your plan.

There are several points I feel need to remain the same at present and not be changed. These are listed below.

1. The West Loopout Allotment season of use should remain 11/1 to 12/15 and Spring use should be 4/1 to 5/20

10.1

2. On the West Loopout Allotment I have never seen Antelope on the allotment. I have

10.1

cont.

grazed sheep for 27 years on this allotment. This seems to be ridiculous to allow A.U.M.s for an animal that has never been there or is not there now. There should be no A.U.M.s Allowed for Antelope.

10.2

3. There should be more acres of treatment on West Lookout Allotment. I would recommend the following.

| | |
|--------------------|------------|
| Chain | 2000 acres |
| Plow | 1500 " |
| Burn & spray | 2000 " |
| Pasture fencing | 13 miles |
| Spring Development | 1 each. |

I strongly support Alternative number three.

Thank You.
Mervill Beckstrom

10.1 James Ekins (1983), UDWR's conservation officer for Tooele County, has observed antelope at the southern end of South Skull Valley Allotment, as well as further south into the West Lookout Pass Allotment. The 9 AUMs are estimated to be needed to sustain the minimal antelope use in this area.

10.2 All rangeland improvements proposed in the EIS were designed with a multiple use approach. With this approach, some acreage must be left undisturbed to add variety to the vegetative community. These undisturbed areas benefit wildlife habitat and maintain visual quality. (Refer to page 11 of the Draft EIS.) Also see Response 8.2.

In addition, projects were designed with BLM's economic constraints in mind. Proposed projects were restricted to the size and number which would cover those areas with the highest probability for success, environmental benefits, and economic return. (Refer to page 17, Standard Measure No. 8 in the Draft EIS.)

Additional rangeland improvements may be identified and implemented under separate environmental assessments if the improvements are determined to be of greater benefit than those previously proposed.



Utah Wilderness Association

325 JUDGE BUILDING · SALT LAKE CITY, UTAH 84111 · (801) 359-1337

31 July 1983

Mr. Frank Snell
District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Frank:

We are commenting on the Tooele Grazing EIS. There are several concerns that need to be addressed in the final EIS.

11.1 The EIS notes that the no grazing alternative was dismissed because it does not meet the CEQ regulations for a reasonable alternative. However, the NRDC court case requires a complete analysis of the environmental impacts of grazing including the no grazing option.

11.2 A closely related problem is the array of alternatives. The four alternatives--emphasize wildlife habitat, emphasize livestock grazing, no action and balanced use/preferred-- are the same "canned" alternatives found in every grazing EIS. There seems to be no attempt to come up with innovative alternatives. All the alternatives, except the no action alternative, have the same proposed range improvements. This hardly represents a diversity. All alternatives, except the status quo no action alternative, increase the numbers of livestock AUM's. Again, this is one-sided and shows no diversity in the array of alternatives.

11.3 Wildlife should be given equal consideration with livestock on the public lands. The present allocation is heavily biased toward livestock. There are about 3 AUM's of livestock forage to every AUM of wildlife forage. The emphasize wildlife habitat alternative does not change this ratio. How can an alternative be geared toward wildlife when 3 out of 4 AUM's are allocated to livestock?

11.4 We have several questions concerning wildlife and the preferred alternative. Will season-of-use changes in sheep grazing be adequate to ensure the stability of the Puddle Valley antelope herd? The EIS notes that this herd may actually be declining. The preferred alternative would not propose to allow transplants (reintroductions) of elk into the Stansbury Mountains and antelope into the Faust region. Were these animals previously found in these areas? Does the Forest Service oppose the elk transplant into the Stansbury Mountains? The reason given for not allowing the antelope transplant into the Faust region is the possibility of crop damage. However, there are no crops south of the South Desert Tooele Ordnance Depot. A real compromise would allow both elk and antelope to exist in these areas with livestock.

-2-

11.5 The EIS notes several raptor use areas. The Cedar Mountains and the White-rocks area have heavy eagle and prairie falcon use. Why were these two areas not included in the raptor high use areas? Golden eagles also use the Deep Creek Mountains.

11.6 Table 1-1 notes the various management categories for the allotments. How did the BLM determine the categories for the allotments with no trend data? Why are Stansbury Mountain and Stansbury/Broad Canyon Allotments in the Custodial category? Although it is possible to determine why many allotments were placed in a specific category, it is not possible on every allotment. This should be explained in the final EIS.

11.7 During the past several years, the BLM conducted a SVIM inventory in the Tooele EIS region. Was this data used in this EIS?

11.8 Most of the allotments do not have long-term monitoring studies. It is difficult, if not impossible, to determine forage allocation without trend data. This lack of necessary information is unacceptable. Trend studies after the EIS (after the fact) should not occur. Why hasn't this data been collected in the past?

11.9 Page 22 of the EIS explains how range condition was determined. Range condition, as generally defined, is the first factor mentioned on page 22, "(1)ecological range condition, which compares a range site's present plant composition with its potential plant composition..." Range condition, as is interpreted in this EIS, is not the proper way to determine condition. Condition is only a reflection of ecological condition. The "real" range condition should be included in the final EIS. There is no criteria given in this EIS to see how the range conservationists arrived at this new definition of condition.

11.10 The EIS does not mention any comparison areas or relict sites. Are there any of these areas in the region? The range condition table, albeit changed to a different definition of condition, shows no allotments with any percentage in excellent condition. Are we to assume by this no areas exist for comparison studies?

11.11 The EIS notes on Table 1-2 that a major problem in the category I allotments is overstocking. However, little or no reductions are proposed for these allotments. Why is this the case?

11.12 Page 22 notes the criteria for suitability. The first two criteria, distance from water and slope, vary with the class of livestock. The four mile distance from water should be reduced to about two miles for cattle. The EIS also notes that slope affects the distance from water criterion. This criterion should be clearly spelled out before the final EIS. For example, winter range grazed by sheep, may be suitable at much farther distances from water (sheep can eat snow) than summer cattle range. Slopes of 50% can be grazed by sheep; however, cattle may require slopes of 40% or less. The suitability criteria should be more clearly defined. Improper assessment of suitability leads to severe distribution problems, a major problem in the Tooele region according to the EIS.

11.13

Page 15 of the EIS mentions a policy of livestock conversion. There is no explanation in the EIS of the criteria for conversion, season-use-changes with conversions, changes in suitability as a result of conversions and conversion factors from cattle to sheep (much of the area is better suited for sheep than cattle, the usual conversion, about 5 sheep per cow, may not be accurate). These criteria should be clearly spelled out in the EIS.

11.14

The EIS notes the importance of riparian areas to wildlife. On pages 23-26 there are maps showing the various riparian areas in the EIS region. Are there other riparian zones not indicated on these maps? All riparian areas should be fenced to protect the wildlife habitat.

11.15

Page one and page three mention the increases in soil and water runoff and decreases in visual resources. This applies to all alternatives. Why were there no alternatives developed that would stop this resource damage? How can this EIS be compatible with the multiple-use concept by allowing this degradation?

11.16

Page 73 of the EIS says that no range improvement projects are planned for any WSAs or appealed units. However, the map showing the proposed improvements (plate 2) seems to show projects inside the Deep Creek WSA and the Cedar Mountains WSA. The projects inside the Deep Creek WSA are burn and seed and chain and seed at the western edge of townships 9 and 10 south in range 18 west. There also appears to be a plow project inside the Deep Creek WSA at about T. 9 S., R. 18 W. section 11. Plowing projects also appear scheduled for the Cedar Mountains WSA in townships 1 and 2 south in range 10 west. The final EIS should clarify this concern.

In summary, the EIS needs more information before it can meet the necessary requirements (eg., trend data). The array of alternatives is small and disappointing. It should be broadened to include a wide range of possibilities, each suited for this specific area.

Thanks for the opportunity to comment. We hope these suggestions are of help in the final EIS.

Cordially,

Gary Macfarlane
Staff Member

11.1 The National Environmental Policy Act (NEPA) (1969), as amended, does not require consideration of a "No Grazing" Alternative. Section 102(e) of NEPA requires that "appropriate alternatives" recommending or proposing courses of action be studied, developed and described in EISs. CEQ NEPA regulations (paragraphs 1502.14[a] and 1508.25[b]) direct that the range of alternatives discussed includes a rigorous exploration and objective evaluation of all reasonable alternatives, together with a brief discussion of other alternatives eliminated from detailed study and the reasons for eliminating them.

As indicated in the section titled "Alternatives Dismissed" in Chapter 1 of the Draft EIS, the elimination of livestock grazing was dismissed as an alternative because it did not meet the test of a reasonable alternative.

FLMPA (1976) directs in Sections 102 (a)(7) and (80) that public lands be managed on the basis of multiple use and sustained yield and in a manner "... that will provide food and habitat for fish and wildlife and domestic animals..." In Section 103 (1), it states that "The term principal or major uses include, and are limited to, domestic livestock grazing, fish and wildlife development and utilization..." Thus, under existing legislative guidance and implementing regulations, elimination of grazing would be inappropriate, unreasonable and could not be considered by the decision-maker.

The National Resources Defense Council (NRDC) has apparently recognized that "No Grazing" is an unrealistic alternative in comments on past grazing EISs. In responding to a question about the dismissal of the No Grazing Alternative in the Final Henry Mountain Grazing Environmental Impact Statement, BLM noted that letters from NRDC regarding general comments on EISs and specific comments on the Challis, Idaho and San Luis, Colorado EISs addressed this subject. On page 1 of the San Luis Grazing Final EIS it states: "Of course no one really expects the BLM to totally eliminate grazing entirely in the San Luis Resource Area or any other of the broad areas to be covered in future EISs." (U.S. Department of Interior, Bureau of Land Management, 1983).

The Final Henry Mountain EIS also noted that similar statements were contained in NRDC comments on the Preliminary Draft and Final Tonopah Grazing EISs. The comments on the Tonopah Final EIS included the following statement: "Indeed, no one could seriously expect the Bureau to eliminate livestock grazing entirely in the Tonopah Resource Area..." (U.S. Department of Interior, Bureau of Land Management, 1983).

11.2 The alternatives in the Draft EIS are indeed similar to those in other recent grazing EISs. NEPA requires alternatives to be reasonable, and BLM policy and CEQ regulations require a range of alternatives. The NEPA process requires 1) a no action alternative, 2) identification of the existing situation, and 3) an agency preferred alternative. Alternative 1 of the Draft EIS meets requirements 1) and 2) above. Alternative 4 is the BLM preferred alternative. Alternatives 2 and 3 provide outside parameters for impact analysis favoring use of grazing resources for wildlife (Alternative 2) and livestock (Alternative 3).

Proposed rangeland improvements are the same for Alternatives 2, 3 and 4 because those improvements were designed to benefit as many resource values as possible. Also see Response 6.1.

In response to the comment that Alternatives 2, 3 and 4 all show increases in livestock AUMs, see Response 6.3.

- 11.3. Under Alternative 2, Emphasize Wildlife Habitat, forage is made available for UDWR's prior stable and objective levels for deer, elk, antelope and bighorn sheep. With wildlife populations at these levels, forage use would be far below 50 percent utilization (see page 56 of the Draft EIS). Rather than waste the remainder of available vegetation, this extra forage is allotted to livestock up to the allowable use. In addition to forage use, other potential competitive factors such as cover, water and space were also considered. In areas where conflicts occurred, proportionately less forage was given to livestock to help minimize these conflicts.

- 11.4. Although changes in season-of-use would improve early spring antelope habitat, it is doubtful that this alone would stabilize the Puddle Valley Antelope Herd. Many other factors such as recent range fires, man caused disturbances, and water availability and distribution could also be affecting the expansion of the herd.

To BLM's knowledge, there has been no concrete evidence that antelope or elk inhabited the Rush Valley and Stansbury Mountain areas. Both areas contain suitable habitat for the species involved and could have supported a historic population.

The Forest Service is opposed to the reintroduction of elk in the Stansbury Mountains. (See Comment Letter 17.)

The rationale for not recommending introductions of antelope into Rush Valley and elk into the Stansbury Mountains is located in Appendix 4 of the Draft EIS.

Agricultural crops are grown in and around the towns of Clover, Faust and Vernon. The potential for crop degradation would exist in all of these areas if antelope were introduced into Rush Valley.

- 11.5. As mentioned in the raptor section of Chapter 4 in the Draft EIS, raptor use occurs on almost all public land within the planning area. During the planning process, all known raptor nest sights were plotted on a map. Raptor use in the Cedar Mountains, as well as the Deep Creek Mountains is not as high as in those areas shown in Figure 3-7 in the Draft EIS. As more areas are inventoried and nest sites are located, additional raptor high-use areas will be added to the map.

- 11.6. Many factors were used in determining the category in which an allotment was placed, such as the present range condition, present management, existence of resource conflicts, improvement potential, and possible economic return on investments. Any one or all of these factors could have determined the category.

Stansbury Mountain and Stansbury/Broad Canyon Allotments were placed in the Custodial category because there is limited potential for positive economic return on public investment. Also, present management is satisfactory to prevent deterioration of the current resource conditions and potential for land treatment and development is low. These factors outweigh the minimal conflicts with wildlife and the possible inclusion of parts of these allotments in a wilderness area.

Categorization was done in the allotment analysis process conducted during the Tooele planning process. Each allotment was analyzed individually considering years of data and field observation. Details of this magnitude were not necessary for the level of analysis published in this EIS. The allotment files, including the allotment analysis, are open for public inspection during working hours at the Salt Lake District Office.

- 11.7. Vegetative trend information from SVIM was included in data used by the EIS team. SVIM data was not used for forage allocation.

- 11.8. Actual use data and utilization information have been used by BLM to estimate the grazing capacity of the allotments. Trend studies can also be used for this purpose, but these studies require long-term evaluation to determine the success or failure of an entire grazing management system. Often, ranges must be overgrazed for a number of years for trend studies to indicate a downward trend and a need for changes in the grazing system. Utilization studies can show yearly impacts from grazing on the vegetation, including possible range abuse. Utilization studies are more affected by yearly changes such as climatic conditions; therefore, both trend and utilization studies are used when available.

Trend studies will continue to be important in the future management of the planning area to evaluate the success or failure of the grazing systems developed after this EIS. These trend studies will supply the information required to determine if reductions are required, if grazing management practices are proper, or if increases in livestock numbers are appropriate.

Currently, many allotments do not have established trend studies because of the lack of time, funding, and personnel to establish and read the studies. As many trend studies are being established as BLM's available funding allows. These trend studies will be used to make future grazing management decisions.

- 11.9. Stoddart and Smith (1955), in their book entitled Range Management, define range condition to be a term which "relates current condition of the range to the potential of which the particular area is capable." They further explain that composition comparison is but one factor that may be considered in estimating range condition. Factors including growth, reproduction, litter accumulation, topsoil condition, erosion and runoff may be included, and the range manager should "have a concept of excellent range, broad in application." Stoddart and Smith raise the question "as to whether climax is the most productive or desirable

condition," and that forage production is often considered when determining range condition. It is felt by the range personnel in the Salt Lake District Office that the juniper vegetation type is one situation in which range condition determined purely by composition is inappropriate. If these sites were rated in this manner, these dense stands of juniper with little or no forage value with excessive runoff and erosion would be considered in good to excellent condition. For these reasons, the BLM range conservationists have used the previously mentioned criteria to determine range condition.

- 11.10 No comparison or relic areas were identified during the inventory phase of the Tooele land-use planning. However, most areas within the planning area have been grazed or changed in some manner (i.e. removal of fire, invasion of introduced species, etc.). Several enclosures which exclude livestock grazing are present in the planning area. These sites are used by field personnel when determining range condition, site potential, etc.

- 11.11 Overstocking is identified on all allotments in which the grazing capacity is estimated to be less than the current active preference. Some of these allotments are currently being used at or below their grazing capacity but are still identified as being overstocked because of their active preference.

Appendix 1 (page 84 of the Draft EIS) indicates that under Alternative 4, the nine overstocked allotments would be reduced by a total of 4,119 AUMs. This is an average reduction of 18 percent from active preference. This change is greater under Alternative 2 in which wildlife were given first priority for forage use.

- 11.12 The suitability criteria used in this EIS are stated in BLM Utah State Office Manual Supplement 4412 (see page 22 of the Draft EIS). During AMP development, more detailed suitability criteria will be developed. This will include all the factors affecting suitability and will be specific to each allotment.

- 11.13 The Livestock Conversion Policy is open for public inspection at the Salt Lake District Office during working hours. Briefly, the policy makes the following points:

- 1) Each allotment will be analyzed individually and grazing capacity will be based on suitable areas only.
- 2) The initial grazing capacity will be set at 80 percent of the estimated grazing capacity with 5 percent increases each year in the next 4 years, if appropriate.
- 3) Necessary improvements will be made before conversion; operators will bear the cost of improvements needed for conversions initiated by them.

- 4) If sheep or cattle AUMs go unused, the operator will allow for use of these AUMs by other individuals.

- 5) Season-of-use will remain the same or have less spring use.

- 11.14 Page 31 of the Draft EIS states that BLM has identified 58 springs, 109 reservoirs, 29 wells and 5 perennial streams on public land in the planning area. These waters, along with several guzzlers constructed by both BLM and UDWR, provide water for wildlife during all or part of the year.

Protection planned for riparian habitat is described on page 7, Standard Measure No. 17, in the Draft EIS.

- 11.15 The multiple-use concept of resource management requires trade-offs between absolute protection and maximum use of resources.

Each alternative in the EIS considers impacts caused by erosion, runoff, sedimentation and impacts to visual resources so that decision-makers can evaluate what resource trade-offs are acceptable. To state that erosion, runoff, sedimentation and impacts to visual resources would increase is not to say that unacceptable degradation would occur. No changes to the EIS are needed.

- 11.16 The rangeland improvements you mention are proposed for implementation outside the WSA boundaries. Plate 2 has been corrected to reflect this change. (See Revisions and Corrections for Plate 2.)

Comment Letter 12

July 19, 1983

Mr. Frank Snell, District Mgr. - SLDO
U.S. Dept. of Interior
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Frank,

Enclosed are some comments on the Draft Tooele Grazing Environmental Impact Statement.

12.1

It would be helpful to all members of the public to know where perennial public waters are located within the planning area. This could be accomplished by means of a visual or table included in Chapter III. The information need not be extremely technical. Data on water rights or volume could be investigated by the interested reader.

12.2

I would like to clarify the quote attributed to me on page 69. Sedimentation can cause oxygen stress in certain instances because of the oxidation of organic matter introduced during run-off. It is this organic matter that produces oxygen stress and not the sediment itself. (Also- please correct the spelling of my name BORNHOLDT).

12.3

In the water resources section of Chapter IV (pages 60-62), several acre-foot consumptive values are given. This section doesn't state whether or not future introductions of wildlife by UDWR are considered when arriving at the level of consumptive use. Such information needs to be included.

12.4

In addition to the benefits of riparian fencing listed on page 69, streambank soil erosion is reduced and stimulated vegetative re-growth along the stream provides "edge-effect" habitat enhancement for local wildlife.

Generally speaking, the EIS presents a great deal of information in a concise and accurate manner. Table 2-4, Comparative Summary of Environmental Consequences, is an excellent example.

Sincerely,

Dave Bornholdt

Dave Bornholdt

Response Letter 12

- 12.1 The use of a map or table identifying perennial public waters was considered during preparation of the Draft EIS and was determined to be of limited value in clarifying impacts. The location and characteristics of these waters are available in documents at BLM's Salt Lake District Office.
- 12.2 We concur with your comment, and the change has been made in the Final EIS. (See Revisions and Corrections for page 69.)
- 12.3 Chapter 2 of the Draft EIS identifies animal numbers that would occur in each alternative. This includes wildlife numbers, including introduced animals, by species. All analysis in Chapter 4 relates to those numbers of animals.
- 12.4 The benefits of fencing riparian zones as mentioned in your comment were discussed on pages 59 and 62 of the Draft EIS.



4613 South 4000 West
P.O. Box 20222
Salt Lake City, Utah 84120
Phone 968-3548

July 29, 1983

Mr. Dennis Oaks, E.I.S. Team Leader
U.S. Bureau of Land Management
Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Oaks,

H.S.U. would like to thank you for this opportunity to comment on the draft Tooele Grazing E.I.S.. We will comment briefly on each of the mentioned alternatives.

ALTERNATIVE 1:

This action would allow for a decline in all wildlife habitat over the long term due to over-utilization. This habitat includes the prey base and winter range of the American Bald eagle, as well as 8 miles of riparian areas. Such a decline could cause mortality and displacement of all wildlife species in the affected areas. This alternative is not justifiable.

ALTERNATIVE 2:

This alternative would be the choice of The Humane Society of Utah as it appears to stress a close balance between wildlife and livestock, while emphasizing wildlife. There is potential for the improvement of 11 miles of riparian habitat through fencing and a long term improvement of all wildlife areas. There are minimal proposed reductions in the wild horse herds, but without total removal. Land treatments with alternatives 2, 3 and 4 could cause mortality or displacement of small mammals and reptiles, but the increase in long term habitat could offset such losses.

ALTERNATIVE 3:

This alternative emphasizes livestock forage and proposes the total removal of the Onaqui wild horse herd. This herd, consisting of 100 animals, cannot be removed without much additional data to support such a drastic action. Herd reductions in the Cedar Mountain group, on public land, to less than 20-25 individuals will leave insufficient numbers of animals to constitute an adequate gene pool and will leave the herd with lowered viability. The American Bald eagle winter range of 5375 acres

DEDICATED TO THE ELIMINATION OF FEAR, PAIN AND SUFFERING OF ALL ANIMALS
Gifts and Bequests to the Society are deductible for income and estate tax purposes.

July 29, 1983
Mr. Dennis Oaks, E.I.S. Team Leader
Page 2

would be over-utilized, possibly causing its displacement. Most wildlife habitat would decline due to competition with livestock and over-utilization. Additionally, the Society is concerned over indications that BLM plans to remove about 50 horses from the Cedar Mountain herd in August of this year due to range fires. How will this affect the proposed reductions mentioned in this alternative?

ALTERNATIVE 4:

As the BLM preferred alternative, it parallels alternative 2 and affords wildlife 2416 AUMs less over the short term and 724 AUMs over the long term. Vegetation would recover more slowly due to livestock usage. This would cause displacement of many wildlife species as competition for forage increases.

The Society appreciates your consideration of its views on this EIS and would appreciate your comments.

Sincerely,

Helen D. Robison
Helen D. Robison
Senior Investigator

- 13.1 In Alternative 3, livestock were given first priority for the available forage on the allotments (refer to page 13 in the Draft EIS). This level of use would require the removal of the Onaqui Mountain herd and the drastic reduction in the Cedar Mountain herd. The reduction of the Cedar Mountain herd would leave 100 horses on DOD's Dugway Proving Ground (refer to page 62) and 18 horses on BLM administered land. This would allow a sufficient gene pool to maintain a healthy population.
- 13.2 Removal of wild horses prior to the implementation of grazing decisions would lower the number of animals which would need to be removed if Alternative 3 were chosen. However, the AUMs allocated under Alternative 3 would remain the same; therefore, impacts to wild horses would not change under Alternative 3.
- 13.3 As shown in Tables 2-1 and 2-3 in the Draft EIS, forage for big game would exceed current use in both Alternative 2 and Alternative 4. Therefore, no displacement of existing animals would occur.



Penstemon
utahensis

UTAH NATIVE PLANT SOCIETY

Reply to: P. O. Box 1555
SLC UT 84110

July 29, 1983

Mr. Frank Snell, District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Re: Draft Tooele Grazing EIS

Mr. Snell:

14.1

In response to the above EIS, we are extremely concerned about the impacts of grazing on *Sclerocactus pubispinus* as well as on other rare or sensitive plant species that occur in the planning area. Other than standard measure 5 listed on page 16 of the draft, the draft fails to outline any proposed management actions with respect to these species. As a basis for future grazing management decisions, the draft should contain this information. Some actions could include increased enforcement attention, restricting grazing on certain allotments, marking of sensitive spots, fencing, etc.

14.2

It is noted that fencing is proposed in the Gold Hill area. How will this fencing affect *S. pubispinus*? Will the entire population be on one side or the other? Could this fencing be extended to help *S. pubispinus* (protect)?

14.3

It is stated on page 29 that *S. pubispinus* is expected to be dropped from the USF&WS's list of candidate species. This comment is rebutted. Botanists and other informed individuals disagree as to whether or not this species should be dropped from the list. According to cacti specialists Lyman Benson and Dorde Woodruff, some populations of what were thought to be *S. pubispinus* are better assigned to *S. spinosior*. This makes *S. pubispinus* a more restricted or sensitive species than would otherwise be the case.

14.4

Even if *S. pubispinus* is dropped from the list, it must still be considered a "watch" species, a species that is very sensitive to land uses. The BLM is required to take appropriate protective action in connection with this species whether or not the USF&WS decides not to currently list it as endangered or threatened to ensure that listing will never be necessary.

-2-

14.5

Further, the statement on page 29 indicating that the primary threat to *S. pubispinus* is collection by private parties is disputed. While collection is certainly a concern, the primary threat appears to be grazing. The species is definitely affected by overgrazing having become increasingly rare over the past 100 years due to deterioration of the habitat areas. Entire populations of *S. pubispinus* have been decimated by grazing animals (Dorde Woodruff, personal communications, 1983). Clearly, the combination of trampling and subsequent loss of vegetative cover which results from grazing is causing this (and other) cacti species to slowly die out.

Thank you for this opportunity to comment. Please forward a copy of the final EIS document to us.

Very truly yours,

UTAH NATIVE PLANT SOCIETY

Anthony J. Frates
Anthony J. Frates
Conservation Committee

AJF:t

- 14.1 BLM surveys indicate that the distribution of rare and sensitive plant species within the Tooele Planning Area is wide. As noted on page 29 of the Draft EIS, Welsh describes the habitat of *S. pubispinus* as the ancient shoreline of the Pleistocene lake, a broad and encompassing habitat.
- 14.2 Fencing was proposed within the Gold Hill area to control livestock. Standard Measure No. 5, as stated on page 16 in the Draft EIS, will protect *S. pubispinus* from destruction during the construction of the fence. Because of the wide distribution of *S. pubispinus*, no fence would exclude the species on one side or the other. Also refer to Response 14.1.
- 14.3 *S. pubispinus* will remain on the sensitive plant list as long as it is proposed for classification. BLM is required to treat it as a threatened or endangered species until a decision is made to drop the species from the sensitive list.
- 14.4 As long as *S. pubispinus* is proposed for classification, it remains on the sensitive plant list. After a decision is made, this species may remain on the sensitive plant list even though it may not be considered threatened or endangered. As long as this species is on the sensitive plant list, BLM must give special consideration to its protection.
- 14.5 Further contact with Welsh (1983) indicates that livestock trampling and parasitization by beetle larva are also threats to *S. pubispinus*. Although livestock trampling has forced this cactus to exist under other species for protection in some areas, large populations have not been eliminated.

Establishment of young Great Basin fishhook cactus in the open would require the complete elimination of livestock grazing for 20 to 50 years. Present populations of *S. pubispinus* continue to be identified and more plants are known to exist today than ever before because of increased study data (Welsh, 1983).

Adverse impacts would occur to *S. pubispinus* if rangeland improvements resulted in livestock concentrations in areas supporting this species. However, Standard Measure No. 5, as stated on page 16 of the Draft EIS, would assure that these impacts would not occur. Trampling and larva damage have both been added as threats to this species in Chapter 3. (See Revisions and Corrections for page 29.)

August 1, 1983

Mr. Frank Snell, District Manager
Bureau of Land Management
2370 So 2300 West
Salt Lake City, Utah 84119

Dear Mr. Snell:

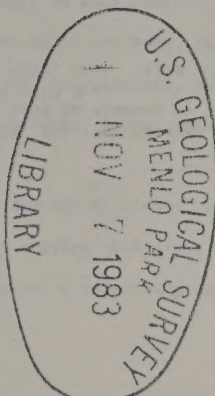
15.1 As the chairman of the Utah Sportsman Riders Association, I represent about 5000 active ORV riders and their families. As such, I feel that we should have an input in the use of all public lands. We feel that the use of public lands are being decreased every year in favor of grazing animals and such. The land is for public use and, therefore, should be considered for recreational use as well as for grazing of a few ranchers.

15.2 We would appreciate being notified in advance of any closure or change in the use of public lands so we could put in our opinions on the subject. There is a growing number of ORV use in the state and their opinion should make an impact on the use of public lands, but most people do not know or get any information about the use of the lands.

15.3 We appreciated receiving the letter and information on the proposed land use in the Tooele County, but we received it after the dates of the public hearings; therefore, we were unable to attend and express our comments. We would appreciate it if you would contact the Utah Sportsman Riders Association before permanent decisions are made.

Sincerely,

Craig Smith
Craig Smith, Chairman
Utah Sportsman Riders Association
5795 Sanford Drive
Murray, Utah 84106



- 15.1 See Response 2.3. Also, several off-road vehicle organizations were invited to participate in the land-use planning/EIS process.
- 15.2 We encourage and invite public participation throughout our land-use planning process to assure that individuals' and organizations' views are incorporated into our decisions for management of public lands. If you know of other persons or groups who are interested in activities in the Salt Lake District, please have them contact BLM so that they will be included in public involvement activities.
- 15.3 Written comments on the Draft EIS were considered equally with comments presented at the public hearing. Following the 30 day review period on the Final EIS, BLM will begin preparation of the grazing management program for the Tooele area. Interested individuals and groups, including yours, will be asked to participate as decisions are formulated.

Vernon, Utah
July 28, 1983

Frank Snell, District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Snell,

I have reviewed the draft Environmental Impact Statement prepared on alternative grazing management programs for the Tooele Planning Area. I am the major livestock grazing permit holder on the Cottonwood West Allotment, which as I am sure you are aware, consists of both BLM and Forest Service lands. I hold all of the livestock grazing privileges on BLM land on this allotment and either own or manage most of the forest grazing permits on the allotment. My grandfather, Albert H. Ekker, homesteaded in the mouth of Cottonwood Canyon in about 1887. My father John G. Ekker was born on this ranch in 1897 and I was raised there also. Since our ranch is adjacent to the Cottonwood allotment, and our family has grazed livestock and lived in this area for approximately 100 years, I feel that my comments on this EIS should be of considerable value and help in making decisions as to the various alternatives to be considered in the final EIS. Since my income is totally dependent upon my ranching and livestock operation, I am extremely interested in the grazing aspects of the EIS, but I am also a sportsman and appreciate the position and importance of wildlife and other users of the federal lands. I believe I can comment very objectively

on both livestock grazing and wildlife needs, as well as the visual and recreational resources.

In reviewing the EIS, I am generally in agreement with the findings, and feel that great care has been taken to address all issues and interests. I would however, suggest other views or opinions, particularly in the Cottonwood West Allotment:

- 16.1 1. The proposed fence, referred to on page 72 in the last paragraph under Alternative 2, is now a reality, but is hardly visible, and I think it is very compatible with the area. There should be no adverse impact on the visual resource, but the fence will greatly assist the grazing management in the area.
- 16.2 2. While I would be inclined to favor Alternative 4 as a balanced use between livestock and wildlife, I feel that it still favors wildlife over livestock. Wherever an increase in AUM's takes place as a result of range improvement, under Alternative 4 the AUM's are distributed equally between livestock and wildlife. Appendix 3 on page 86 illustrates this. Appendix 1 on page 81 shows the AUM's for livestock and wildlife on each allotment. On Cottonwood West Allotment, cattle AUM's are three (3) times greater than wildlife AUM's. Therefore, if Alternative 4 truly was a balanced use alternative, then livestock should received 75% of the increased AUM's and wildlife 25%. I believe this is the case on many other allotments also and that it should be more adequately addressed in the final EIS.
- 16.3 I would also disagree with the estimated number of deer on the Vernon Herd Unit 13 found on Table 3-6 on page 36. I graze livestock on the Benmore

16.3
cont.

Allotment on the north side of the Sheeprock Mountains as well as the south side and as a result spend much time in this area. I would estimate the number of deer to be substantially less than the 10,345 indicated in Table 3-6. I feel there is little competition between livestock and wildlife on the Cottonwood West Allotment. Due to the drastic reduction of cattle numbers on our allotment over the last year or two, I think any grazing increases granted as a result of proposed range improvements should be given to livestock.

16.4

3. With regards to seasons-of-use as found in Alternative 4 in Appendix 2 on page 85 of the EIS, I would generally agree with the dates and seasons-of-use indicated. However, with regards to the Cottonwood West Allotment, I feel on an average year, grazing could begin on May 1. This allotment has many crested wheatgrass pastures, and we are the only allotment with the exception of Cottonwood East, to have a full years rest built into the grazing cycle; that is, one full years rest every three (3) years on each pasture. I am confident, that this earlier turn out date would not hurt the grass, when used in the rotation plan we now have on the allotment, but would dramatically reduce the cost of feeding hay during this two week period.

On the Benmore Allotment, on the Uinta National Forest, we have been grazing crested wheatgrass pastures starting on April 21 and have found that under a rotation plan, the grass is improving rather than

deteriorating. The Benmore Allotment is about the same elevation or even higher than the Cottonwood Allotment, therefore, I am certain May 1 would be an acceptable date.

I appreciate the opportunity to respond to this EIS, and feel that through cooperative efforts between BLM, ranchers, sportsmen, recreational, and all users of the public land, we can better manage and improve the land for the benefit of everyone concerned.

Respectfully,

James H. Ekker

James H. Ekker
Box 41
Vernon, Utah 84080

Response Letter 16

- 16.1 Rangeland projects previously constructed should not have been analyzed in the Draft EIS. These projects have had environmental assessments written on them prior to their construction. For this reason, we have deleted or changed the appropriate sections to remove this fence from analysis in the EIS (see Revisions and Corrections for pages 12 and 86.)
- 16.2 The alternatives in this EIS were designed to provide a range of forage use levels. Distribution of additional AUMs resulting from rangeland improvements provided an analysis of alternative long-term uses of forage. As stated under Alternative 4 on page 14 of the Draft EIS, livestock and wildlife would receive equal consideration if both could benefit from the additional forage. Equal consideration was given only after livestock use equalled the current active preference and wildlife numbers equalled the prior stable numbers. Since active preference and prior stable numbers had been met prior to any rangeland improvements proposed for Cottonwood West Allotment in Alternative 4, equal consideration was given to wildlife and livestock.
- 16.3 Existing data from UDWR indicates that current deer numbers are at the levels shown in Table 3-6 in the Draft EIS. The Vernon Herd Unit contains the Simpson Mountains as well as the Sheeprock Mountains.
- 16.4 The Cottonwood West Allotment contains deer winter range. This area is also used as a deer migratory route as the animals leave the Sheeprock Mountains and move into the House Range. See Response 16.2 for a discussion of forage increases resulting from rangeland improvements.

Comment Letter 17

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
324 25th Street
Ogden, UT 84401

1950

JUL 28 1983



Mr. Frank Snell
District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, UT 84119

Dear Mr. Snell:

Enclosed are the consolidated Forest Service comments on your Tooele Grazing DEIS:

Page 1 - Forest Resources - Any fuelwood activities planned adjacent to National Forest System (NFS) land should be coordinated with the local Forest unit in order to avoid possible public confusion relative to ownership boundaries and/or other administrative matters.

Page 7 - Interrelationships with other agencies, groups, and individuals - Where circumstances are conducive to coordinated management programs, we recommend this approach be fully explored in connection with the development of AMP's.

17.1 Pages 12, 13, and 14 - AUM's listed in Table 2-1, for alternatives 2 and 4, do not agree with those shown for livestock in Table 1, page 2.

17.2 Page 34 - Wildlife Mule Deer - Perhaps it should be noted that part of the critical summer range is provided by NFS land in the Sheep Rock and Stansbury Mountains.

17.3 Page 37 - Last paragraph - Any antelope movement on NFS land could become a problem since the existing grazing management fences are not designed to facilitate the movement of these animals.

17.4 Page 41 - Sage Grouse - It should be mentioned that NFS land also provides habitat for a number of grouse, including an important strutting ground in the Little Valley area.

17.5 Pages 43 and 44 - Raptors - It may be well to mention the roosting areas and other key raptor habitat that is found on adjacent NFS land. Considering the mobility of these animals, it is important to recognize the total available habitat on both BLM and NFS land.

Mr. Frank Snell

2

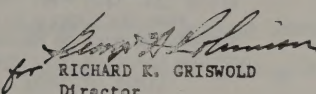
17.6 Page 59 - Alternative 3 - It is certainly legitimate to consider an alternative that emphasizes livestock forage production but only to the extent that the basic soil and vegetal resource is at least maintained, overgrazing is eliminated, and downward trends do not occur.

17.7 Page 62 - Forest Resources, Alternative #1 - If overgrazing is allowed to continue through no action, pinyon-juniper types will continue to expand their range. This being the case, we question the statement that no impacts are expected on the Forest resources.

Page 90 - Paragraph 4 - We concur with the recommendation that elk should not be reintroduced into the Stansbury Mountains.

We appreciate the opportunity to review this document and hope that our comments will be helpful to you.

Sincerely,


RICHARD K. GRISWOLD
Director
Planning and Budget

Enclosure

- 17.1 Table 1 on page 2 of the Draft EIS was found to have several errors. The appropriate changes have been made for the Final EIS (see Revisions and Corrections for page 2.)
- 17.2 BLM realizes the importance of the total available habitat for wildlife and managing the ecological unit. However, the Tooele Grazing EIS analyzes impacts to BLM administered lands and wildlife habitat found on these lands only.
- 17.3 Before antelope are reintroduced, a Cooperative Agreement between Forest Service, BLM and UDWR would be formed. At this time, it would be determined whether or not to include the potential habitat within the Forest Service boundaries. The map of proposed reintroductions should not have included Forest Service lands. The change has been made in the Final EIS (see Revisions and Corrections for page 39).
- 17.4 See Response 17.2.
- 17.5 See Response 17.2.
- 17.6 Alternative 3 shows the impacts of livestock use at the current active preference level or higher. This use could occur if all operators activated the maximum level on their current grazing permits. This alternative provided one scenario in an array of alternatives emphasizing various resource uses. It is important to remember that decision-makers are not bound to choose the grazing program entirely from one alternative, but are free to take desirable elements from all alternatives. In addition, BLM is mandated to manage livestock grazing at levels at or below the capacity of an allotment.
- 17.7 Changes which reflect your concern have been made in Chapter 4 (see Revisions and Corrections for page 62).



SCOTT M. MATHESON
GOVERNOR

STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY
84114

August 11, 1983

Mr. Frank W. Snell
Salt Lake District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, UT 84119

Dear Mr. Snell:

The state of Utah has completed review of the draft Tooele Grazing Environmental Impact Statement. Our comments and recommendations are enclosed for your consideration. The document was well written and organized so that it was easy to follow, and we believe adequately analyzed the environmental consequences of the alternatives presented. We support Alternative 4 as it appears to provide for a balance use of the various resources in this area.

We were pleased to participate in the review of this document and also in its preparation by providing information from various state agencies. If we can provide additional comments or clarifications, please contact the State Department of Natural Resources.

Sincerely,

Scott M. Matheson
Governor

SM:tar

Enclosure

STATE OF UTAH COMMENTS

DRAFT TOOEELE GRAZING ENVIRONMENTAL IMPACT STATEMENT

August 11, 1983

The state supports Alternative 4 as representing the best balance of resource uses within the Tooele Grazing Environmental Impact Statement area. The statement is well written. It is easy to follow and for the most part adequately analyzes the environmental consequences of the four alternatives discussed. However, there are some concerns that the proposed increase of 25,470 AUM's over current use for livestock will not result in range condition improvement throughout the entire area as indicated on the top of Page 60.

Our specific comments and recommendations are as follows:

18.1 Page 2, Table 1 - Under Alternative 4 the AUM's shown for livestock differs from the number of AUM's for livestock shown under Alternative 4 on Page 14 and under Alternative 4 in Appendix 1. The AUM's for livestock in Appendix 1 and on Page 14 are the same, but differ from that contained in Table 1.

18.2 Page 12, Table 2-1 - The total number of proposed AUM's for Alternatives 2 and 4 again differ from that information contained in Table 1, Page 2.

18.3 Page 15, First Paragraph - It states in the paragraph that "Habitat management plans are prepared cooperatively with the Utah Division of Wildlife Resources to ensure that the state's wildlife management objectives are met." All wildlife objectives will not be met for all alternatives. Thus this statement is not common to all of the alternatives.

18.4 Page 15, Grazing Administrative Practices - It indicates that livestock grazing will be monitored and supervised by permittees and BLM. We commend this cooperative approach to the monitoring program, but it would be helpful

18.4
cont.

if more information and details were contained in the document explaining the various responsibilities that the permittee may have as it relates to monitoring.

18.5

Pages 18 and 19, Table 2-4 - For Alternative 4 under "Livestock Grazing" it states that reductions from preference will occur on 49 allotments. This appears to be inconsistent with the information presented on Page 76 under Alternative 4 where it indicates that active preference will be reduced on 42 allotments.

Page 22, Range Condition and Trend - We commend BLM for identifying the distinction that often occurs between ecological condition and range site condition for grazing. We agree that the ecological range condition of a site may not always correspond to the range site condition for grazing. The composition of the plant community needs to be taken into consideration when range condition for grazing of domestic livestock and wildlife is identified.

18.6

Page 28, Table 3-2 - In comparing the information in this table with that in Table 4-1 and the proposed grazing allocations as shown in Appendix 1 for Alternative 4, we find 12 allotments are rated as declining in trend and 9 allotments are overgrazed, assuming that anything over 100 percent use is overgrazed. Yet the proposed AUM allocation under Alternative 4 for the Onaqui Mountain East, South Skull Valley, and Lakeside allotments is the present grazing use, which is apparently over the grazing capacity. Trend studies are available for the Onaqui Mountain East and Skull Valley allotments. It would seem that where range condition and trend information is available and the allotments are in a declining trend, that present stocking rates should be adjusted to a level that would be more in line with the carrying capacity.

18.7

Pages 34-43, Wildlife - Small game is important in the Tooele Grazing Environmental Impact Statement area, particularly mourning doves, cottontails, and chukars. They all exceed sage grouse in total harvest, total hunters, and total hunter days. These three species make up a greater proportion of the state-wide harvest and hunting pressure than does sage grouse. The management of sage grouse is critical because of its sensitivity to change in the sagebrush community. We feel that the sage grouse has been adequately discussed in Chapter 3, but would recommend that the cottontails, mourning doves, and chukars be addressed briefly in this same chapter.

18.8

Page 42, Tables 3-10 and 3-11 - Source of data for both of these tables should be the Division of Wildlife Resources, Upland Game Annual Reports.

18.9

Page 43, "Fish," First Paragraph - Deep, Clover, and Vernon creeks are streams within the planning area that support fish even though they are primarily on private land.

Page 48, Wilderness - We are certainly supportive of the fact that prescribed burns are compatible with wilderness study areas and would encourage the use of prescribed burns more frequently to improve rangeland both in and without WSA's.

18.10

Page 55, Item 5, "Basic Assumptions" - We concur with the statement that it is the responsibility of the Board of Big Game Control to manage the number of big game animals. We, therefore, encourage BLM's active participation in the interagency process so that harvest numbers will be in line with the AUM allocations.

18.11

Page 63, Fourth Paragraph - Reduction in spring livestock grazing does provide more succulent forage for deer during the spring. However, it should be kept in mind that in some cases spring livestock grazing may be beneficial to maintain a good composition of both grass and browse species.

18.12

Page 67, Sage Grouse - The statement is made that "Direct spraying of strutting grounds could cause abandonment of these crucial areas." The experience of our wildlife people has been that in all cases, the direct spraying of strutting grounds has caused these grounds to be abandoned.

18.13

Page 68, Alternative 4 - We agree with the statement "Conflicts between livestock grazing and sage grouse strutting would continue in the South Clover Allotment." The number of strutting males continues to decline in this area. We feel that this decline is at least partially due to the spring sheep grazing. We recommend that this matter be reviewed to see if there is a way to mitigate this impact.

18.14

Page 70 - Peregrine falcons are scheduled for reintroduction at the Timpie Waterfowl Management Area in late summer of 1983.

18.15

Appendix 1, Alternative 1 - Active preference and current livestock use are shown for Alternative 1. It would be helpful for comparative purposes if the preferred alternative contained the active preference, current use, and proposed use by allotment so these figures could be readily compared.

18.16

In arriving at the AUM allocation for deer, a conversion factor of 8.9 deer per AUM was used for forage allocations for both prior, stable, and proposed and current numbers. This is satisfactory for winter use based on the most recent review by academia, state and federal agencies, and livestock organizations. However, it is not satisfactory for summer use and will not provide sufficient forage to sustain mule deer numbers provided for during the summer months. We recommend a conversion factor of 5.8 deer per AUM for summer use. A number of grazing allotments in the planning area sustain summer and year long deer use. Unless two different conversion factors are applied, shortages in forage allocations to deer will result.

18.17

Appendix 2 - For those grazing allotments that contain critical deer winter range and where the grazing season for livestock is late summer, fall, or winter, a significant problem occurs because of the competition between deer and cattle on the winter range. In arriving at final decisions on the allocation and season of use on these allotments, we recommend that this factor be given consideration.

18.18

Appendix 3 - We support the proposed range improvements that are identified for the various allotments in Appendix 3 and recognize that these proposed improvements will improve the range considerably. In the planning phase of these range improvements, we recommend close working relationships with the Utah Division of Wildlife Resources so that the projects may be planned in such a way to benefit both livestock and wildlife.

- 18.1 Table 1 on page 2 of the Draft EIS was found to have several errors. The appropriate changes have been made for the Final EIS (see Revisions and Corrections for page 2).
- 18.2 See Response 18.1.
- 18.3 During the process of developing Habitat Management Plans, BLM considers and attempts to meet UDWR wildlife management objectives. The EIS has been modified to reflect your concern. (See Revisions and Corrections for pages 14-15.)
- 18.4 For several years, BLM has been trying to involve the permittees in both the utilization and trend studies portions of its monitoring program. In addition, allotments with several operators lend themselves to the development of grazing associations. These associations help supervise the livestock use on an allotment.
- The Salt Lake District Office has recently begun to work with the Grazing Advisory Board to begin implementation of the BLM's new policy on Cooperative Management Agreements. This program is fully explained in BLM Instruction Memorandum No. 83-485. This document is fairly detailed and need not be included in the EIS for analysis purposes. It is available for your reference at the Salt Lake District Office during normal working hours.
- 18.5 Table 2-4 on page 19 under Alternative 4 of the Draft EIS should have read that 42 allotments would be adjusted from preference. This change has been made for the Final EIS. (See Revisions and Corrections for page 19.)
- 18.6 Grazing capacity estimates must be made with available data. For the three allotments in question, no more than three years of actual use/utilization data are available (see page 101 of the Draft EIS). The trend studies which show a declining trend on these allotments are indicating effects of use from many years ago, especially in areas where juniper are invading such as on Onaqui Mountain East Allotment. These trees will continue to invade, resulting in a downward trend long after livestock are completely removed. Actual use and utilization must continue to be monitored to further improve the estimate of grazing capacity.
- 18.7 As you mentioned, sage grouse are sensitive to changes in sagebrush communities and are more likely to be impacted by rangeland improvements and grazing practices than are blue grouse, mourning doves, chukars or cottontails. BLM feels that grazing impacts to these other species would be minimal because rangeland improvements and developments would not cause significant impacts to them and, in most cases, would enhance the habitat values for the species involved.
- 18.8 The reference for these tables has been changed. (See Revisions and Corrections for page 42.)

- 18.9 Clover and Vernon Creeks exist entirely on Forest Service or private lands. Those portions of Deep Creek which cross BLM administered lands are not considered perennial, so they would not support a fish population.
- 18.10 BLM has participated in the Interagency Big Game Committee meetings held annually, and appreciates the opportunity to express its goals and interests. BLM feels that this aids both agencies in cooperatively managing the habitat and wildlife within the planning area.
- 18.11 BLM agrees with your comment. Past spring grazing has benefitted many winter ranges in the planning area, making more browse available to deer and elk during this critical time period. Spring livestock grazing will continue to be used as a management tool to maintain these areas in good condition.
- 18.12 Suitable habitat for sage grouse consists of sage brush vegetative types containing a diversity of plant species. Strutting grounds are associated with more open areas. Rangeland improvements, including spraying, which are designed to open dense stands of sagebrush and increase grass and forb production, can be beneficial. Dense cover for nesting and brood rearing should be available in close association with the strutting grounds.
- 18.13 BLM is aware of the problem of sheep grazing on and around this strutting area. Several attempts have been made to modify grazing and reduce impacts to this area but have been largely unsuccessful. Fencing the area would appear to be the best method to insure that the sage grouse would be undisturbed during the strutting period. During the AMP and HMP process, BLM will attempt to resolve this problem.
- 18.14 BLM supports this effort to reintroduce peregrine falcons into their historic range. Standard Measure No. 5 on page 16 of the Draft EIS will be implemented to insure that this species is not adversely impacted.
- 18.15 Because of the large amount of information contained in Appendix 1, it was felt that simplification of the tables would aid the reader's understanding and also minimize printing costs. The comparison can be made by referring back to page 81 for proposed and current use.
- 18.16 During the preparation of AMPs, a more specific and detailed plan for each allotment will be made. In making decisions for each allotment, BLM will use acreage figures for BLM administered lands and use 8.9 and 5.8 deer per cow AUM for winter and summer range conversion factors, respectively. For the purpose of the Draft EIS, the conversion factor of 8.9 deer per cow AUM was used to estimate total deer use in the planning area. BLM realizes that this is only an estimate, and allocations will not be made using the 8.9 deer per AUM for all areas as calculated in the EIS.

- 18.17 Consideration will be given to livestock season-of-use in crucial deer and elk winter ranges before final decisions on allocation and livestock season-of-use are made.
- 18.18 BLM wildlife biologists have and will continue to involve UDWR in locating areas where rangeland improvements or developments would benefit wildlife. In addition, BLM will meet the requirements contained in the BLM/UDWR Memorandum of Understanding concerning rangeland improvements. The time and effort extended by UDWR personnel in reviewing past rangeland improvements and developments are greatly appreciated; UDWR has aided in the proper management of these areas.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

1860 LINCOLN STREET

DENVER, COLORADO 80295-0699

AUG 10 1983

Ref: 8PM-EA

Frank Snell
District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Snell:

The Region VIII Office of the U.S. Environmental Protection Agency has completed its review of the Tooele Grazing Draft Environmental Impact Statement. We appreciate the effort that has gone into its preparation and the consideration involved in balancing competing demands for the existing grazing resource. EPA offers the following comments for your consideration in preparation of the final EIS.

We agree that the preferred alternative, balanced use (Alternative 4) is the most environmentally acceptable. We believe that BLM's riparian management program for this particular planning area is good.

19.1

We are concerned with the relationship of the preferred alternative forage utilization rates to potential long-term erosion problems. Range utilization rates of two to three percent less than the preferred level of 100 percent would be more reasonable and allow for year-to-year differences in allotment production. Since about 70 percent of the range is in only fair to poor condition, this type of management should help speed condition improvement and increase erosion control benefits. Decreased spring livestock grazing, as part of planned grazing systems, could also help improve condition and erosion control values.

According to the system EPA uses to rate draft EIS's, the Tooele Grazing EIS will be rated as LO-2. This means that although EPA has no objections to the preferred alternative as presented in the DEIS, we would like to see additional allotment utilization level restraint considered in the Final EIS.

If you have any questions, please contact Mike Hammer of my staff at FTS 327-2351.

Sincerely yours,

John G. Welles
John G. Welles
Regional Administrator

- 19.1 In the calculation of the proper utilization level for an allotment, the physiological needs of the key plant species are taken into consideration. This then allows these plants adequate growth to maintain their vigor and reproduction. Plant communities in which this proper utilization is taking place will improve in condition and protect the soil from excessive erosion, both in the long and short term. Plants produce more foliage than they require to survive. This excess is what can be harvested by livestock and wildlife. One hundred percent of the excess can be used and, at the same time, the range can improve because the needs of the plants have been considered when determining their proper utilization (see page 56 in the Draft EIS).

Utilization studies are done each year so that good and bad production years are averaged. In this way, excess feed is unused some years and used in succeeding years. In addition, the livestock industry stabilizes rather than fluctuates with yearly climatic conditions.

ORAL COMMENTS AT THE PUBLIC HEARING

The following people presented comments at the public hearing (commentors listed in the order they presented remarks):

| <u>Commentor Number</u> | <u>Commentor</u> |
|-------------------------|--|
| 1 | Jack McEachern, Tooele Wildlife Federation |
| 2 | Ray Staley |
| 3 | Gerald E. Gordon, Utah Wildlife Federation (same as comment letter 2) |
| 4 | Mike Sibbett, Utah Cattlemen's Association |

The following section contains responses to specific comments presented at the public hearing.

Comment 2.1: First, I have some controversies with the wild -- I have no controversies with the wildlife, but on the Fandangle and Black Rock Allotments, they've got some 174 head of deer there. There never have been that many deer there. They have been there since 1936, and maybe 12 head of deer -- if the deer were there, I would have no comment. But to ask to have that many deer there when they're not there and haven't been there, then it's a falsehood.

Response: Under Alternative 1, estimated current deer use for Fandangle and Black Rock Allotments amounts to 67 AUMs. Using the conversion ratio of 8.9 deer per cow AUM, current deer numbers for this area are 50 head. This estimate is supported by years of UDWR and BLM field observations in this area.

Comment 2.2: And the other thing that I would like to ask here is what is the cost of this EIS for this study in Tooele County. Do you have any idea?

Response: The direct cost of producing the EIS (including projected remaining costs to produce the Final EIS) is about \$120,000. This includes salaries, travel, graphics, materials, printing costs and postage.

Comment 2.3: And if we took No. 1 with no action, then we're saying we're only going to use or actually going to use records. And I think that's an unfair discriminatory-type deal for the people that is building up. The guy that went out and went into his allotment and used all his AUM's up, he's setting all right. But the guy who tried to build his AUM's is getting discriminated against.

Response: Alternative 1 functions as a baseline to analyze the impacts from which changes to the current situation can be studied. It also indicates what impacts are resulting from the current management program.

In some cases, operators have taken nonuse and consequently their allotments have improved. Utilization data for these allotments may indicate that no adjustment in livestock numbers is necessary. It is not BLM's goal to hold a permittee at the level of his past use, but rather to assure that the grazing permit is based on a realistic estimate of the allotment's grazing capacity.

REVISIONS AND CORRECTIONS

This section contains the revisions and corrections made to the Draft Environmental Impact Statement. All page numbers listed below refer to the Draft EIS and are in numerical order:

Page 2, Table 1 - See Table 1 (revised) on the following page.

Page 12, Table 2-2 - Replace with the following:

TABLE 2-2

Proposed Rangeland Improvements
for Alternatives 2, 3, 4

LAND TREATMENTS

| | |
|------------------------|--------|
| Chain and seed (acres) | 18,040 |
| Burn only (acres) | 670 |
| Burn and seed (acres) | 4,400 |
| Plow and seed (acres) | 7,686 |
| Spray (acres) | 7,360 |
| Total | 38,156 |

RANGE DEVELOPMENTS

| | |
|--------------------------------|-----|
| Pipeline (miles) | 60 |
| Springs (number) | 19 |
| Wells (number) | 30 |
| Fence (miles) | 172 |
| Fence riparian habitat (miles) | 11 |
| Reservoirs (number) | 27 |
| Guzzlers (number) | 9 |
| Cattleguards (number) | 28 |

Page 14-15, Implementation Program, last paragraph - change the last sentence to:

HMPs are prepared cooperatively with UDWR to assure that the State's wildlife management goals are met where possible considering other resource uses.

Page 19, Table 2-4, Alternative 4 - change as follows:

Reductions from preference should read 42 allotments instead of the 49 allotments as listed.

TABLE 1 (revised)

Summary of Forage Distribution
Management Features, and
Rangeland Improvements for the Alternatives

| Management Features | Alternative 1 Proposed Action- No Action | Alternative 2 Emphasize Wildlife Habitat | Alternative 3 Emphasize Livestock Forage | Alternative 4 Preferred Alternative - Balanced Use |
|--|--|---|---|---|
| Livestock Forage | | | | |
| Cattle AUMs | 40,197 | 37,656 | 48,226 | 42,947 |
| Sheep AUMs | 46,991 | 65,372 | 71,463 | 69,704 |
| Domestic Horse AUMs | 139 | 0 | 146 | 146 |
| Wild Horse Forage | 2,400 | 1,740 | 224 | 1,740 |
| Wildlife Forage | | | | |
| Deer AUMs | 31,247 | 32,527 | 30,799 | 31,846 |
| Antelope AUMs | 518 | 2,480 | 373 | 1,565 |
| Elk AUMs | 511 | 1,245 | 511 | 642 |
| Rocky Mountain Bighorn Sheep AUMs | 0 | 239 | 0 | 189 |
| Total AUMs | 122,003 | 141,259 | 151,742 | 148,612 |
| Allotments With Season-of- Use Changes | 0 | 52 | 0 | 25 |
| Number of Allotment Boundary Changes | 0 | 3 | 3 | 3 |
| Number of Mitigating Livestock Grazing Restrictions | 0 | 32 | 0 | 11 |
| Rangeland Improvements | | | | |
| Land Treatments | | | | |
| Acres Chain and Seed | 0 | 18,040 | | |
| Acres Burn | 0 | 670 | | |
| Acres Burn and Seed | 0 | 4,400 | Same as | Same as |
| Acres Spray | 0 | 7,360 | Alternative 2 | Alternative 2 |
| Acres Plow and Seed | 0 | 7,686 | | |
| Range Developments | | | | |
| Miles of Pipeline | 0 | 60 | | |
| Number of Springs | 0 | 19 | | |
| Number of Wells | 0 | 30 | Same as | Same as |
| Miles of Range Fence | 0 | 172 | Alternative 2 | Alternative 2 |
| Miles of Fenced Riparian Habitat | 0 | 11 | | |
| Number of Reservoirs | 0 | 27 | | |
| Number of Guzzlers | 0 | 9 | | |
| Number of Cattleguards | 0 | 28 | | |

REVISIONS AND CORRECTIONS, CONT.

Page 28, Table 3-2, Range Condition and Trend - change as follows:

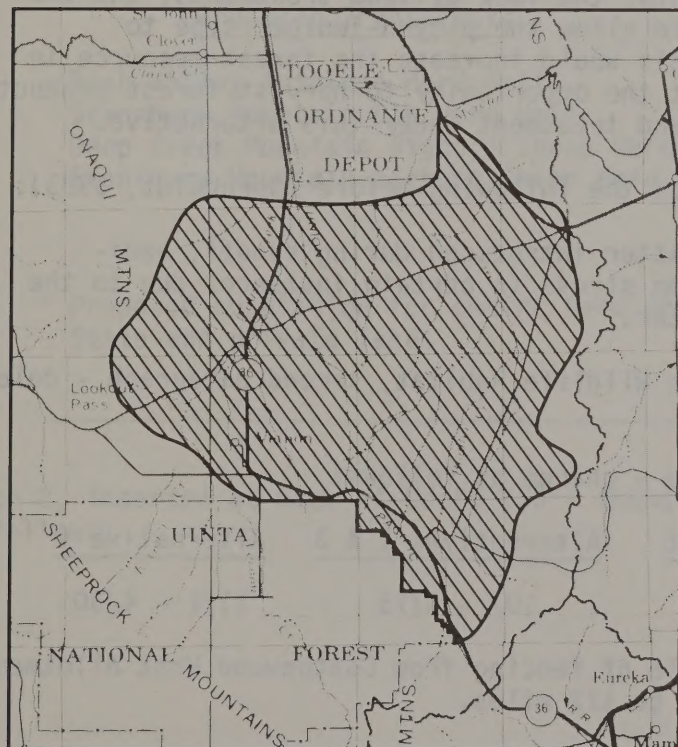
| <u>Allotment</u> | <u>Trend</u> |
|------------------|--------------|
| Skull Valley | Not apparent |

Page 29, Threatened, Endangered and Sensitive Plant Species, 3rd paragraph, last sentence - change as follows:

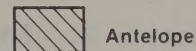
Delete: The primary threat to this species is its collection for sale by private parties.

Insert: Collection for sale by private parties as well as trampling by livestock are the primary nonbiological threats to this species. Beetle larva also parasitize this species, sometimes killing it (Welsh, 1983). Rangeland improvements which concentrate livestock in areas could adversely affect this species.

Page 39, Figure 3-5 - change proposed antelope reintroductions as follows:



LEGEND



REVISIONS AND CORRECTIONS, CONT.

Page 42, Table 3-10 - change source of table to:

UDWR, 1981c

Page 42, Table 3-11 - change source of table to:

UDWR, 1981c

Page 52, Ranch-related economic conditions, third paragraph - add the following as the last sentence:

Although public land AUMs may be transferred from one operator to another, BLM does not recognize that these AUMs have any value.

Page 55, Basic Assumptions and Guidelines - add the following:

10. Water consumption by wildlife and livestock would be as estimated by BLM for each species.

Page 62, Forest Resources, Alternative 1: Proposed Action-No Action - replace the paragraph with the following:

Overgrazing on 9 allotments, the lack of land treatments, and the control of wildfires would allow the pinyon-juniper type to continue to increase. This would increase the forest resource in the planning area but not the opportunity to harvest forest products because of the lack of land treatment under this alternative.

Page 69, Fish, last paragraph - add the following before (Bornholdt, 1983):

Because of the organic matter introduced during runoff, sedimentation can cause oxygen stress in certain instances due to the oxidation of organic matter.

Page 72, Alternative 2: Emphasize Wildlife Habitat, second paragraph - delete the last sentence.

Page 85, Appendix 2, Seasons-of-Use - change as follows:

| <u>Skull Valley Allotment</u> | <u>Alternatives 1 & 3</u> | <u>Alternative 4</u> |
|-------------------------------|-------------------------------|----------------------|
| cattle | 10/ - 6/15 | 11/1 - 4/30 |

Page 86, Appendix 3 - delete 1 mile of fencing from Cottonwood West Allotment. Change the total fencing from 173 to 172 miles.

REVISIONS AND CORRECTIONS, CONT.

Page 87 - add the following as Appendix 9.

ESTIMATED PRIOR STABLE NUMBERS

| <u>Herd Unit</u> | <u>Number</u> |
|--------------------------------------|---------------|
| Box Elder Deer Herd Unit 1 | 250 |
| Heaston Deer Herd Unit 11 | 13,000 |
| Stansbury Deer Herd Unit 12 | 7,600 |
| Vernon Deer Herd Unit 13 | 5,800 |
| East Tintic Deer Herd Unit 14 | 3,600 |
| West Desert North Deer Herd Unit 62A | 500 |
| | |
| Riverbed Antelope Herd Unit 2A | 894 |
| Snake Valley Antelope Herd Unit 2B | 300 |
| Puddle Valley Antelope Herd Unit 15 | 750 |
| | |
| Heaston Elk Herd Unit 4 | 300 |

Proposed Transplants







| | |
|---|------|
| Rush Valley Antelope Herd Unit | 300* |
| Stansbury Mountain Elk Herd Unit | 300* |
| Deep Creek Mountain Bighorn Sheep Herd Unit | 300* |
| Stansbury Mountain Bighorn Sheep Herd Unit | 300* |

* Proposed population for entire herd unit including BLM, Forest Service, State and private land.

Plate 2, inserted at back of Draft EIS - change proposed rangeland improvements as follows:

REVISIONS AND CORRECTIONS, CONT.



-  **CHAIN & SEED**
-  **BURN**
-  **BURN & SEED**
-  **PLOW**
-  **SPRAY**
-  **FENCES**

REFERENCES

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